

121

1 A Five bucks.

2 Q And who makes the ShaveMan?

3 A Gosh, I'm trying to think if I remember the name of

4 the company. It is not one of the three competitors

5 listed on the sheet, but I don't know the name of it.

6 Q So it's not Rayovac?

7 A No.

8 Q Or Remington?

9 A No.

10 Q And what is the Titanium Turbo?

11 A Titanium Turbo is a knock-off of a regular men's

12 shaver. It is not meant to be a travel shaver or a

13 throw-away shaver like the ShaveMan, but it was

14 introduced in North America with very low retails,

15 i.e., sub \$20.

16 Q And who makes the Titanium Turbo?

17 A I don't know.

18 Q And neither the ShaveMan or the Titanium Turbo has a

19 cleaning system associated with it?

20 A No, not to my knowledge.

21 Q And looking at page 9, what is that page?

22 A It appears to be our average retail price per unit in

23 three different six-month windows, during three

24 six-month windows.

25 Q Can you explain why the pricing it looks like in

122

1 January to July was at \$47.12, why for the same period

2 in 2003 it would have dropped to \$44.15?

3 A I do not know why it would have dropped. I don't know

4 specific business initiatives that are behind it.

5 Obviously back to our earlier discussions, consumers

6 were buying products of ours with lower average

7 retails, but I don't know the specific business

8 initiative behind that.

9 Q And then for the same period from January to July 2004

10 that price is back up at \$53.92. What would be the

11 cause of that jump?

12 A It's likely as we introduced new SKUs with more

13 features and benefits for the consumers going after

14 that good, better, best category, we offered a shaver

15 with more features and benefits to the consumer and

16 subsequently hit a price point that we previously were

17 not playing in.

18 Q And part of that introduction of new product, was that

19 the cleaning center products?

20 A Yes.

21 Q So the R-9500 was introduced in between those two

22 periods, is that correct?

23 A No. In between which two periods? I'm sorry.

24 Q In between July 2003 and January of 2004.

25 A Yes, that's correct.

123

1 Q And subsequent to July 2004 the new foil products,

2 foil cleaning center products came on the market,

3 correct?

4 A That's correct.

5 Q What would the current average retail price of

6 Remington products be?

7 A I don't know without going and looking at the data.

8 From NPD I don't know that off the top of my head.

9 Q Would you guess that it would be higher?

10 A I really -- I don't know because of many factors

11 affecting it, it could be higher, it could be lower.

12 Q Would the introduction of the two foil shaver cleaning

13 systems be a factor that would lead you to conclude it

14 would be higher?

15 A Not necessarily because there could be other -- there

16 could be other factors that would conclude that would

17 be driving it lower.

18 Q But if that were the only new product introduced, for

19 example, would you --

20 A If that would be the only new product introduced,

21 naturally because the product has more features and

22 benefits than our other products, it's at a different

23 price point than our other products in the marketplace

24 and it's above the average, so by definition if that's

25 the only change, yes, the average retail would go up.

124

1 Q You mentioned the source of this information NPD.

2 What is NPD?

3 A Independent market research firm, National Panel

4 Data.

5 Q Is National Panel Data somebody that Rayovac pays for

6 this information?

7 A Correct.

8 Q Do you pay them to compile the information or do you

9 pay them for access to the information?

10 A Probably both. They collect the data. It's panel

11 data, so it's consumer survey data, and they would

12 ultimately house that. They would house it so they

13 would own the data, but then also they obviously have

14 to compile it.

15 Q And do they compile data on competitors as well?

16 A Yes.

17 Q And do you have access to that data as well?

18 A I believe so.

19 Q In what form does NPD produce this data to Rayovac?

20 A I don't know the specific form that they produce the

21 data to us.

22 Q Is it a document?

23 A I don't know if they give us a report or if we get it

24 on line, an electronic version of it.

25 Q Have you ever seen one of these reports?

1 A I have worked with the marketing groups at times with
2 retail prices and panel data and things like that.
3 Q Okay. Did you provide any of those or did marketing
4 provide those documents to counsel?
5 A Yes, brand marketing would have been the providers of
6 this.
7 Q I want to go back to looking at our pricing sheet,
8 Exhibit 34.
9 A Okay.
10 Q The first line, the first row I should say, Tgt
11 standard cost, is that targeted standard cost?
12 A Yes.
13 Q And for all products it says existing. What does that
14 mean?
15 A Basically for all the products on this printout these
16 are existing SKUs within the company, so rather than
17 have a targeted standard, you would have an actual
18 standard.
19 Q And SRP just below it, is that suggested resale price?
20 A Retail.
21 Q Retail price. Okay. And for the 9500 that's listed
22 at \$129.99. Is that the correct price for the
23 R-9500?
24 A That's the correct everyday price of the R-9500.
25 Q That's the suggested price, correct?

1 A Correct.
2 Q Is there a requirement that your retailers sell at
3 that price?
4 A It's not legal for us to dictate retails.
5 Q If I walked into Target today, do you know how much I
6 would pay for the shaver?
7 A I don't know exactly how much you would pay for the
8 shaver in Target today.
9 Q Is there a requirement that the suggested retail price
10 is something it will be within a certain range of the
11 suggested price?
12 A At retail?
13 Q Yes.
14 A Again it's illegal for us to dictate retails. That
15 would be a form of dictating a retail.
16 Q Do you know what is the suggested price for the
17 MS-5500?
18 A A hundred bucks.
19 Q And the 5700?
20 A I believe it's \$119.99.
21 Q And the WDF-7000?
22 A I believe it's \$80.
23 Q Do the suggested retail prices change?
24 A Do the suggested retail prices change, they could,
25 they haven't changed on these items.

1 Q Since their introduction?
2 A Not to my knowledge.
3 Q So they could change. Why would they change?
4 A Perhaps a new SKU enters the marketplace and the
5 existing SKU needs to be repriced to appropriately fit
6 in to match features and benefits with price point
7 relative to a new SKU offer.
8 Q And when you're talking about a new SKU here, you're
9 talking about a competitor's SKU?
10 A Potentially, but not necessarily.
11 Q You described generally the process by which
12 Remington, Rayovac arrives at product prices. How did
13 Remington arrive at the pricing for these products
14 specifically?
15 A For the pricing of the R-9500?
16 Q Start with the R-9500.
17 MR. UELAND: Are you asking apart
18 from what he's already said?
19 Q We talked about the general process. I'm interested
20 in the specific process for the R-9500.
21 A Although I wasn't party to the specific price
22 discussions, the same process would have been followed
23 understanding the features and benefits that this
24 particular system offers and the shaver offers and
25 seeing how that fits into the marketplace relative to

1 other SKUs in the marketplace and then expected retail
2 and affected retailer margin and so on.
3 Q Who was involved in the price discussions for the
4 R-9500?
5 A R-9500 was probably people that are no longer with the
6 company that were part of Remington prior to our
7 acquisition.
8 Q Such as who?
9 A I'm trying to remember the names of the people that
10 were in marketing. I met a couple of them, but only
11 once or twice. A fellow by the name of Jay Lester
12 might have been involved with it.
13 Q And what were the features and benefits that the 9500
14 offered that would have been relevant to pricing?
15 A It's cordless, worldwide voltage, LCD versus LED
16 readout, triple head fully independent shaver,
17 naturally it's got the cleaning system in there, so
18 that's a feature that would have to factor in,
19 titanium, battery life, you know, the quality of the
20 battery and the quality of the components going into
21 the shaver, the overall shaver quality, you know, of
22 convenience and closeness and comfort.
23 Q Anything else?
24 A Those would be the main drivers. I mean obviously
25 putting it all together, those are the features that

129

1 would say, okay, what retail can this thing bear out
2 in the marketplace.
3 Q And how is it determined what retail will bear out in
4 the marketplace, what factors go into that
5 determination?
6 A The features and benefits on the shaver and our past
7 experience with existing SKUs.
8 Q Is there market research performed in advance of
9 pricing?
10 A Sometimes, yes. In terms of formal market research
11 you mean?
12 Q Or informal.
13 A Sometimes, yes, I've got to believe at some level or
14 another informal would be performed every time. It
15 would be foolish to launch a product and not have any
16 idea where it's going to land.
17 Q What do you mean by informal market research?
18 A Understanding what SKUs we offer, but what SKUs are in
19 the retail marketplace at what price points, what
20 sorts of features and benefits those SKUs might have.
21 Q In looking at the marketplace to set a price for the
22 R-9500, what other SKUs in the marketplace were
23 considered?
24 A I don't know the exact SKUs that would have been used
25 to set that price.

130

1 Q Without knowing the SKUs, is there a category of
2 products that would have been considered?
3 A Certainly it would be products at the higher price
4 point and not necessarily unique to a given
5 competitor.
6 Q What products were considered the competitors or
7 potential competitors for the R-9500?
8 A I don't know. Certainly Norelco's higher end SKUs
9 would be considered a competitor to it. Our existing
10 SKUs would be considered a competitor to it because of
11 the fact that they are all rotary systems.
12 Q What about Braun's Clean and Charge?
13 A I don't know that it was or I don't know that it was
14 not.
15 (Exhibit 36 is marked for identification)
16 Q Would you take a minute and look at that.
17 (Witness examining document)
18 A Okay.
19 Q What is this form?
20 A This form is a form that Remington used to move
21 forward with the project.
22 Q Does this form give you any indication of what
23 products would have been considered or were considered
24 competitor products for the R-9500?
25 A Yes.

131

1 Q And what are those products?
2 A This form lists those competitive products as Braun
3 Syncro foil cleaning and charging and one Flex
4 Integral under \$100.
5 Q It also mentions external research with inside product
6 development. What is that?
7 A Can you refer to where --
8 Q I'm sorry, under No. 3, consumer needs/benefits.
9 A At times when we launch or look to launch a new
10 product, we'll do concept testing with independent
11 market research firms to find out the demand, if you
12 will, for a given item, and so that's what that would
13 be from. It would be an example of that.
14 Q Have you seen the inside product development report?
15 A Not that I'm aware of.
16 Q Was it provided to counsel?
17 A I wouldn't have been in possession of it, so if it was
18 provided to counsel, it would have been by somebody
19 other than myself.
20 Q Who would that have been?
21 A It would have been marketing management, brand
22 management, or potentially like a research and
23 development person like a Yuri.
24 Q Let's go back to Exhibit 25 for a moment.
25 A Okay.

132

1 Q The page numbered R 13796, it's the page about the
2 9400.
3 A Okay.
4 MR. UELAND: I'm sorry, what page
5 are we on?
6 MS. WOLF: Exhibit 25 version of
7 the marketing plan.
8 THE WITNESS: 13796.
9 Q It talks about a rotary shaver cleaning system down to
10 the critical \$99 retail price point. Why is the \$99
11 price point considered critical?
12 A In general in the retail market there are certain key
13 price points that individuals will pay, and \$99 is not
14 a unique critical price point unique to the shaving
15 category, it's a critical price point in the
16 marketplace on a variety of goods.
17 Q Was the original idea to create a 9400 specifically to
18 hit this price point?
19 A I believe that to be the original idea, although, I
20 mean, short of talking to the exact individual who had
21 the idea, there may have been something else driving
22 it I guess.
23 Q Who was the individual who had the idea?
24 A I don't know.
25 Q Was there someone at -- I know the project has not

133

135

1 been followed through. Was there someone at Rayovac
2 driving the development of the R-9400?

3 A Driving the development of the R-9400, we did not
4 bring the R-9400 to the marketplace, so the
5 development of this product was not driven to the
6 production state.

7 Q Right, but at some point it was planned for
8 production, correct?

9 A At some point it was evaluated to be added to the
10 line. It was never -- orders were never placed
11 against it, and suppliers didn't gear up to produce
12 it.

13 Q Who was evaluating whether or not to bring it to the
14 line in addition to yourself?

15 A That would be brand management.

16 Q And I'm just blanking on his name. We talked about
17 him a bunch today. Who was that?

18 A Sean Martin.

19 Q So Sean Martin would know what was in mind in terms of
20 the \$99 price point, and you would guess that it was
21 Sean Martin's idea to create a shaver for a \$99 price
22 point?

23 MR. UELAND: Objection,
24 mischaracterizes his testimony.

25 MS. WOLF: It was a question.

134

136

1 A If you would like me to guess, I could guess that it
2 would be Sean.

3 Q We obviously prefer that you knew given that it was
4 within -- the pricing products was within the
5 designated topics.

6 MR. UELAND: The 9400 is not on the
7 market. It's not within the scope of the
8 deposition topics.

9 Q The prices of Braun's products, were they considered
10 in evaluating the introduction of the R-9400 to the
11 market?

12 A Being that they were a competitor in the marketplace,
13 they would have had to have all been considered, ours,
14 Braun's, Norelco's, anyone else in that price point
15 range of \$80 to \$120.

16 Q Do any of Braun's Clean and Charge products come in at
17 that \$99 price range?

18 A I believe that to be true, but I'm not certain of
19 that.

20 Q That they do?

21 A I believe that they do, but I'm not certain of that.

22 Q We talked about Sean Martin as the director of brand
23 management. Who is Jim Doyle?

24 A Jim Doyle is division vice president in charge of
25 Remington products marketing at our company.

1 Q Is he Sean Martin's boss?

2 A Yes.

3 Q Was Jim Doyle with Remington prior to the merger?

4 A Yes.

5 Q What about Sean Martin?

6 A Sean Martin worked at Rayovac when we acquired
7 Remington.

8 Q Does Sean Martin report directly to Jim Doyle then?

9 A Yes.

10 Q Who created the men's shaving 2004 marketing plan?

11 A A specific document?

12 Q This specific document, 25. (Indicating)

13 A No. 25? Probably would have been a team effort led by
14 Sean.

15 Q And who else would help Sean?

16 A Jenny Severson from the administrative standpoint put
17 it all together. Certainly Jim Doyle would have been
18 involved with reviewing it. Individuals that work
19 under Sean would have been involved as well.

20 Q Who are those individuals?

21 A Specific to men's shaving, probably Suzanne Stelzer
22 would be the main or only person.

23 Q Why was this marketing plan created?

24 A Why was this marketing plan created? The same reason
25 anybody creates a marketing plan, to provide direction

1 on where you would like your product lines to go.

2 Q How often are marketing plans put together?

3 A As a rule, marketing plans are put together annually
4 and revisited as needed throughout the year. They may
5 be occasionally brushed off at certain times like
6 before a sales meeting, for example, you might review
7 your marketing plan and brush it up, but the actual
8 plan itself should be an annual process.

9 Q Okay. Was this ever a formal presentation?

10 MR. UELAND: This being 25?

11 MS. WOLF: Yes.

12 A I would speculate that yes, it was. Obviously a
13 version of this was used as a formal presentation
14 somewhere someplace. Now, whether it was this exact
15 version, but yes, you don't go to this much work and
16 then throw it in a file cabinet.

17 Q Did you ever see some version of this presented?

18 A Yes.

19 Q When was that?

20 A During our sales meeting.

21 Q Who gave the presentation?

22 A Combination of Jim and Sean.

23 Q And other than yourself, who was in the audience of
24 the sales meeting?

25 A Usual folks, sales force, other marketing folks

137

139

1 representing other brands, some business analysts, I
2 mean, like I said, the usual folks that would attend a
3 sales meeting.

4 Q You said representatives of other brands?

5 A Sean Martin's counterparts representing other product
6 lines.

7 Q Other product lines, but, for example, no one from
8 Norelco?

9 A No, no, I'm sorry, at our company we use brands
10 interchangeably with product lines, so we'll refer to
11 the alkaline brand as the alkaline product line or the
12 alkaline brand.

13 Q You have also seen Exhibit 28, which is described or
14 titled Men's Shaving Business Review. How does the
15 marketing plan differ from the business review?

16 A A business review would be more geared toward kind of
17 strategic direction, what's happening, where we want
18 to go and so on and so forth, where the marketing plan
19 would incorporate that strategic direction into more
20 of a tactical plan, tactical actions.

21 Q So were they designed for different audiences?

22 A Yes.

23 Q And who would the audience be for the business review?

24 A Business review might very well include senior
25 marketing management, and portions of this would be

138

1 used to review with senior company management as well.

2 Q Set that aside for just the moment. We talked about
3 the process for developing the pricing for the
4 R-9500. What was the process for developing the
5 pricing for the MS-5500?

6 A The majority of that pricing work would have occurred
7 before with similar individuals that were involved in
8 the R-9500 process.

9 Q You said the majority. Did part of that take place
10 after the merger?

11 A Certainly as we look to launch, we launched a product
12 almost a full year after we merged the companies
13 together. Certainly that wasn't launched without at
14 least reviewing the pricing information.

15 Q And who participated in that?

16 A Again we don't necessarily sit down and formally have
17 a pricing meeting to say, okay, here is the day where
18 these six people come together to do pricing, but the
19 folks that would participate in that in some form or
20 fashion along the way would be a Sean Martin, a Jim
21 Doyle, someone like myself at various points along the
22 way, again not that we sit down and have a formal,
23 okay, today we set the price on the MS-5500.

24 Q And did you participate in setting the price on the
25 MS-5500?

1 A No, I don't recall participating in that at all. I

2 believe probably when that legwork was completed I was
3 in a previous role because being that I was just in
4 this role for just over a year now or, heck, not even
5 a year now, that pricing would have been well under
6 way.

7 Q Have you participated in pricing for any of the other
8 products that incorporate the cleaning system?

9 A Subsequent to --

10 Q Other than the 5500 or the R-9500.

11 A In terms of establishing their retail price point?

12 Q Yes.

13 A Yes.

14 Q For which products?

15 A The R-9500 as well as the R-9400 as we were evaluating
16 it.

17 Q And what was your role in establishing the price for
18 the R-9500?

19 A Not in establishing it, in evaluating our existing
20 price and options about where we might want to go from
21 where we are now.

22 Q Did the price change?

23 A It has not.

24 Q Were you considering changing it?

25 A We are considering changing it.

140

1 Q For what reasons are you considering changing it?

2 A On the basis of SKUs in the marketplace.

3 Q Which ones?

4 A Specifically Norelco has announced they're coming
5 forth with a cleaning system, and the trade data
6 that's been shared says it will give us pricing fits.

7 Q What do you mean by pricing fits?

8 A It's believed that it will be priced below where we're
9 priced on our 9500, and it's believed it will have
10 similar features.

11 Q And when is this product supposed to hit the market?

12 A This fall at the latest.

13 Q Has a final decision been made?

14 A No. Well, has a final decision been made on?

15 Q Whether or not to alter the existing price.

16 A On the R-9500?

17 Q Yes.

18 A No. For a second there I thought you were talking
19 about Norelco's launch, that obviously I'm not part
20 of.

21 Q Did you participate in the pricing -- going back to
22 the pricing for the MS-5500, do you know what other
23 products in the marketplace were considered?

24 A From the face of this document, this one talks about
25 the rotary --

1 Q Hold on actually.

2 (Counsel examining documents)

3 MS. WENDLANDT: I'm sorry, you were
4 referring to Exhibit 36 before?

5 THE WITNESS: Correct, and that
6 refers to the rotary.

7 (Exhibit 37 is marked for identification)

8 MR. UELAND: While the witness is
9 reviewing the document, can we go off the record
10 for a second?

11 MS. WOLF: Sure.

12 MR. UELAND: 2:10.

13 (A short recess is taken)

14 MR. UELAND: On 2:16.

15 Q Just going back to one moment ago when we were talking
16 about evaluating the possibility of changing the price
17 of the R-9500 in response to Norelco's introduction of
18 a cleaning system, is Rayovac contemplating raising or
19 lowering the price based on the entry into the market?

20 A Lowering.

21 Q If you could look at Exhibit 37, does this help you
22 with what products were considered and looked at with
23 regard to the entry, the pricing point of the 5500 and
24 the 5700?

25 A Yes.

1 name is Peter, but I do not know his last name, and I
2 don't believe he would have been considered a
3 marketing manager.

4 Q Would a marketing manager be involved in setting the
5 pricing on product?

6 A Yes.

7 Q So presumably if Peter Katz was the marketing manager
8 on this product, he also would have been involved?

9 A Presumably.

10 Q Now, after the merger who at Rayovac would have been
11 involved in finalizing the price decision on the 5700?

12 A Sean Martin.

13 Q Go back to Exhibit 25, which is the men's shaving
14 marketing plan. I want to look at R 13769. The title
15 of that page talks about Remington being
16 underdeveloped within the premium segment. What does
17 that mean?

18 A Going back to the sheet you gave me earlier today,
19 Exhibit -- no, that's not it. There was a sheet you
20 had given me earlier today which has good, better,
21 best on it.

22 Q Twenty-six.

23 A Twenty-six did you say?

24 Q Yeah.

25 A I thought we didn't use 26, didn't it turn into 27?

1 Q And what were those products?

2 A It lists some Braun products and it also mentions some
3 Norelco products.

4 Q And did you participate in the pricing decision for
5 the MS-5700?

6 A No.

7 Q And are you aware who did participate in the pricing
8 for the MS-5700?

9 A No. Again, this was done prior to acquisition, so I
10 could speculate the individuals in the Remington
11 organization that may have been involved in this, but
12 this dates back to substantially before we bought the
13 company.

14 Q And who were those individuals at Remington who were
15 involved?

16 A If I was to speculate, I would speculate Jim Doyle was
17 probably involved and I don't know if a Jay Lester was
18 part of their organization during this time frame or
19 not, but those are the two folks I'm familiar with
20 that were directly working with men's shaving prior to
21 our acquisition.

22 Q I see a name on here, Peter Katz. Who is Peter Katz?

23 A I don't know that I know Peter Katz. I don't recall
24 Peter Katz. I'm trying to think. There is one man
25 that came to us from Remington who I think his first

1 Q Yeah, 26 or 27, both.

2 A In any case, OPP, good, better, best, it's that type
3 of a segmentation.

4 Q And premium coordinates to best?

5 A Premium and best would have similar meanings
6 certainly, yes.

7 Q What defines the premium segment?

8 A As it's shown on this chart here, they chose to define
9 the premium segment as price points above \$80.

10 Q Is it desirable to have high sales in the premium
11 segment?

12 A It depends.

13 Q The statement that Remington is still underdeveloped
14 within the premium segment, would that be an
15 indication that Remington was looking to develop the
16 premium segment?

17 A It conveys a message that there appears to be an
18 opportunity for Remington in the premium segment.

19 Q What kind of opportunity?

20 A Relative to the other segments our share is
21 underdeveloped in the premium segment.

22 Q Do you know why that is, why is that?

23 A I would speculate it's because of the numbers of SKUs
24 in each of the segments and the success that
25 different -- that we have had at the different price

1 points with the different features and benefits.
 2 Q Is it fair to say then that Remington has
 3 traditionally struggled in the premium segment?
 4 MR. UELAND: Objection, vague as to
 5 what you mean by struggle.
 6 A As we look at the premium segment, we have done better
 7 in other segments versus how well we have done in the
 8 premium segment.
 9 Q And is that out performance in other segments by
 10 design or by accident?
 11 MR. UELAND: I missed a word in
 12 there. I just didn't hear you.
 13 Q Is that performance in the premium segment -- or under
 14 performance in the premium segment --
 15 MS. WOLF: I'm sorry. Could you
 16 read it back, please.
 17 (Reporter reads back last question)
 18 Q Do you understand the question?
 19 A No.
 20 Q You said traditionally Rayovac has done better in
 21 other segments than it has in the premium segment.
 22 Was that a conscious decision by Rayovac to pursue
 23 other segments more aggressively?
 24 A As we develop our products, we continue to add
 25 features and benefits to them that allow you to be in

145

1 the different price categories, and historically the
 2 products that we have developed were developed to fit
 3 voids in these categories.
 4 Q When you say these categories, which categories?
 5 A The middle categories where we perform well, the \$20
 6 to \$80 range.
 7 Q So is Remington a new player in the premium segment or
 8 Rayovac a new player in the premium segment?
 9 A What do you mean by new?
 10 Q Relative to the \$20 to \$80 range, is that a targeted
 11 area of marketing?
 12 MR. UELAND: That's a different
 13 question I guess. I don't understand what you're
 14 asking. Answer it if you can, but I'm confused.
 15 A I'm confused as well. Are we a different player --
 16 Q Is pursuit of a premium segment a new initiative for
 17 Rayovac within the last -- since 2003?
 18 A I don't know that it was -- I know we are pursuing it
 19 now. There is opportunity there certainly, and so we
 20 are pursuing that now. Prior to then I don't know
 21 that they were necessarily aggressively or not
 22 aggressively pursuing it.
 23 Q Has there been a formal directive to more actively
 24 pursue the premium market?
 25 A Yes, we are actively pursuing the premium market.

146

1 Q And how do you know that? Who has told you?
 2 A It's part of these types of communications.
 3 (Indicating)
 4 Q And that would be a management level decision?
 5 A It would be a brand management decision that would set
 6 the initiatives based on what opportunities appear to
 7 exist in the marketplace.
 8 Q If you would turn now to 13813 in the same packet and
 9 take a minute and look that over.
 10 MR. UELAND: I just invite the
 11 witness to review as much of the document as you
 12 feel comfortable. Pointing out individual pages
 13 in a document that's over 200 pages long, you
 14 know, it is what it is.
 15 MS. WOLF: If he has trouble
 16 answering the question, he can certainly take the
 17 time to review what he needs to.
 18 MR. UELAND: That's all I said.
 19 Q There is a section of the presentation here called
 20 risks and opportunities. On the risk side there is a
 21 list of things included. Who put together this
 22 section of the presentation? You mentioned it was a
 23 collaborative effort.
 24 A Being that this is not my specific presentation, I
 25 would speculate Sean Martin put it together.

147

1 Q Sean put together this list. One of the risks listed
 2 is the Braun cleaning base patent to the tune of
 3 \$8 million. What is the source of that number?
 4 MR. UELAND: Objection, I just
 5 caution the witness that to the extent that that
 6 number or any of the basis behind it comes from
 7 communications with an attorney, I instruct you
 8 not to answer on the basis of privilege.
 9 A I don't know the basis for where this came from.
 10 Q Why would risk related to the Braun cleaning base
 11 patent be included in a marketing plan?
 12 A If it's a marketing plan to be reviewed with senior
 13 marketing management, you would want all your cards on
 14 the table, the risks and opportunities that exist
 15 relative to your business. Being that there is an
 16 active lawsuit by Braun against Remington, it
 17 certainly is a risk.
 18 Q Would it impact marketing?
 19 A I don't know what you mean by would it impact
 20 marketing.
 21 Q Would a litigation impact the way a product was
 22 marketed by sales representatives or by Rayovac as a
 23 company?
 24 A Not that I'm aware of unless there would be specific
 25 legal -- I can't think of the word I'm looking for;

148

149

151

1 but legal holds or legal direction from I guess like
2 an injunction or something like that, then naturally
3 it would have to if that were deemed that to be the
4 case. Looking at this sheet, I can't see how in any
5 way, shape or form this sheet, the risks and
6 opportunities would have been getting at that sort of
7 initiative in terms of should we market our products
8 differently. Reviewing this sheet does not lead me
9 down a path of that was the spirit in which this sheet
10 was created.

11 Q You mentioned that the marketing plan, and we have two
12 different versions that at least one version was
13 likely used at a sales meeting?

14 A Um-hum.

15 Q So would sales representatives then be aware of the
16 pending litigation?

17 A I don't believe that is something that our marketing
18 group would share with the sales folks in terms of
19 saying, hey, sell differently or do this differently.
20 I think if that information were shared with the sales
21 force, it would be in a manner such that so you're
22 informed, should you hear this on the street, should a
23 customer ask you about this, this is ongoing, but
24 certainly in terms of the details surrounding it, that
25 would not be part of a sales presentation.

150

1 Q And has the sales force been informed?

2 A I don't know the answer to that.

3 Q Who would be responsible for informing the sales
4 force?

5 A I guess our sales operations person.

6 Q And who is that?

7 A Kent Klagos.

8 Q Kent Klagos?

9 A Right.

10 Q Have there been situations where Mr. Klagos has
11 informed the sales force of legal actions pending
12 against?

13 A Not that I'm aware of.

14 Q What about informing them of legal actions brought by
15 Rayovac?

16 A Brought by Rayovac?

17 Q Against competitor products.

18 MR. UELAND: Ever? Are you asking
19 ever?

20 A I mean ever against competitive products, I mean --

21 Q In the time that you have worked at Rayovac, are you
22 aware --

23 A I don't know how Kent would have communicated to the
24 sales force, but there has been times in the past
25 where competitors have pursued us and we have pursued

1 competitors on various issues in the battery category,
2 claims issues and/or patent issues.

3 Q And the sales force has been made aware of those?

4 A I don't know that they have specifically been made
5 aware of those. Again in the spirit of making sure
6 they're not surprised in front of a customer, it would
7 make sense.

8 Q Would you just take a look then at the next page. The
9 last item on the list of open issues is the Braun
10 cleaning system patent contingencies. What does that
11 refer to?

12 A I don't specifically know.

13 Q How do these lists of open issues differ from the
14 risks listed on the previous page?

15 A Generally when we create a list of risks and
16 opportunities there is a known, there is something out
17 there that we can identify, an initiative or something
18 fairly specifically and say, okay, this is something
19 that's out there. It may or may not be real. It
20 obviously wasn't real enough to build into our
21 official plan or else it wouldn't be listed as a risk
22 or opportunity. It would be in our numbers.

23 Open issues generally are less significant or
24 more vague situations that like, you know, ShaveMan
25 follow-ups, for example, as shown on this sheet, how

152

1 are consumers using ShaveMan, you know, are not going
2 to directly impact our financials immediately or our
3 plans. So it would be an open issue, something we
4 want to learn more about, but it doesn't necessarily
5 affect our plan or our financials.

6 Q Why would the Braun cleaning patent contingencies be
7 listed on both the risks and open issues?

8 A I don't know. I don't know why they would be listed
9 both places. You could speculate that the one is we
10 still have more to learn and it will play out over
11 time as to why it's on the open issues list.

12 Q Just take a look for me at R 13905. Could you just
13 tell me what FPO stamped across that page means.

14 A I don't know what that acronym is. I should. It's
15 one of those just general -- I'll do something like
16 this when I'm working on a slide, for example, and
17 I'll write work in progress on it and just put it
18 across there. I don't know what FPO stands for.

19 Q Do you know what it means in this presentation?

20 A No, I don't. I do know that it is in the section
21 called the appendix because the pages we were
22 previously on were the end of the regular
23 presentation, so consequently these slides may or may
24 not have ever been used at the end of this stack.
25 It's past the section of backup slides.

153

1 Q And are backup slides generally shown?
2 A Generally not shown as a rule.
3 (Exhibit 38 is marked for identification)
4 Q Can you take a moment and just look at that document.
5 (Witness examining document)
6 A Okay.
7 Q This is a document entitled Men's Shaving National
8 Sales Meeting and is dated November 2nd, 2004. What
9 is the purpose of this document?
10 A This would be a presentation where we communicate the
11 marketing plan to our sales force or portions of our
12 sales force.
13 Q Is this something that happens every November?
14 A Different times throughout the year and different
15 times we have various levels of sales meetings.
16 Q What are the different levels of sales meetings?
17 A For example, at times we may have a sales meeting that
18 just basically includes the sales force and the
19 marketing group is coming in and presenting to senior
20 sales force, for example, division vice president and
21 above. Sometimes it may be just certain segments of
22 the sales force that they're working with. Other
23 times, like we did this past February, we go out to an
24 off-site location and it will be a bigger
25 celebration -- or not celebration, but a bigger

154

1 gathering of people that includes not only the sales
2 force but the larger population I described earlier
3 of, you know, sales force, sales management, business
4 analysts, marketing people and so on, marketing folks.
5 Q And who would have made this document?
6 A Again collaborative effort probably largely led by
7 Sean Martin.
8 Q And Sean would have all similar presentations from the
9 sales meetings for the past two years since 2003?
10 A Since Sean has been involved with it, he would have
11 them, he would have access to all of them, yes.
12 Q How long has Sean been involved?
13 A I don't know. Certainly it was after the acquisition
14 of Remington when he started to get involved, at least
15 the last year, but we've only owned the company for a
16 year and a half, so somewhere in that six-month window
17 or so.
18 Q When this presentation is made at the national sales
19 meeting, is there a handout given to the sales
20 representatives?
21 A Generally not anymore. We generally don't give out
22 hard copy samples or hard copy presentations because
23 the sales force screams about having to carry them
24 home.
25 Q So it would be a power point type of presentation or

155

1 slide presentation?
2 A It's a power point presentation and, you know, the
3 latest sales meetings I have been at they did not hand
4 out hard copy three-ring binders. In the past I have
5 been to sales meetings where you show up and when you
6 go home, you go home with a stack of three-ring
7 binders, but I don't recall going to a sales meeting
8 where we have done that in the last year.
9 Q When was the last time you remember getting a pile or
10 stack of binders?
11 A Probably February of '04.
12 Q And what was included in that binder?
13 A There were actually two binders, and one was on the
14 Rayovac brands and the other was on the Remington
15 brands, and at the time it was right as the companies
16 were merging together, so consequently we were a mass
17 information download, if you will, sell sheets and
18 product familiarity, what's the category look like and
19 so on and so on and so on.
20 Q Would a presentation such as this with this type of
21 information have been included?
22 A I'm not sure the whole presentation would have been.
23 Certain key areas out of here that an individual
24 wanted to highlight certainly would have been part of
25 it, but to take this entire presentation and slam it

156

1 in there, that wasn't necessarily the intent of the
2 binders either.
3 Q I have seen three documents that look reasonably
4 similar and have a lot of overlapping information.
5 What is the distinction between a national sales
6 meeting presentation, a marketing plan and a business
7 plan?
8 A A national sales meeting presentation is geared to
9 communicate information to your sales force to get
10 them at the very basic level to tactically go out and
11 execute. A marketing plan might get into some more of
12 the reasons and the drivers behind our strategies and
13 have some tactical information in it as well but also,
14 you know, start at a higher level of building up a
15 strategy. And what was the other question, a business
16 review?
17 Q Yeah.
18 A A business review is meant to be more so with senior
19 management to say here is where we have been and here
20 is where we're going and here is how we're performing
21 or have performed versus our financial plan and so on.
22 (Exhibit 39 is marked for identification)
23 Q Take a moment and just look that over.
24 (Witness examining document)
25 A Obviously a quite lengthy document.

157

1 Q What is this document?

2 A Having not seen this document in the past, I would

3 speculate that it's Remington's version of the thicker

4 documents we previously reviewed. It says Marketing

5 Plan 2003, although not in a pretty power point slide

6 show presentation format. There is probably similar

7 levels of information packed in this Exhibit 39 as

8 there is in Exhibit No. 25.

9 Q This looks like a Remington as opposed to a Rayovac

10 pre-merger document too?

11 A Yes.

12 Q Who made this presentation?

13 A I don't know.

14 Q Do you know why it was made?

15 A Honestly, I don't know that a presentation was made.

16 I know that you provided me a document that's titled

17 Marketing Plan 2003 Men's Shavers, but specifically

18 the source of this document, why or where it was used,

19 I don't know.

20 Q Is Jim Doyle the person who would know that having

21 come from Remington?

22 A Yes, that's the person I would ask.

23 Q Just under the first page under section A, pricing, it

24 says, "We must defend against Norelco's aggressive

25 pricing action." How would one go about defending

158

1 against aggressive pricing action?

2 A You could defend against aggressive pricing action by

3 a variety of different methods. You could introduce

4 consumer promotions, create more excitement to the

5 category, put more money behind advertising. You

6 could meet them straight on with reducing price on our

7 existing SKU or you could introduce other SKUs that

8 match up to those new price points.

9 Q Is it common practice in the industry to engage in all

10 of those methods you just mentioned, promotions,

11 increased advertising, meeting the pricing,

12 introducing new products?

13 MR. UELAND: Objection, calls for

14 speculation as to across the industry wide. He

15 has no basis to know that.

16 Q You can answer the question.

17 A I would suspect the industry would use all of those

18 tools at the appropriate times.

19 Q And does Rayovac use those tools?

20 A Again at the appropriate times.

21 Q In the time that you have been with Rayovac, has

22 Rayovac ever modified its pricing to compete with

23 another product in the men's shaving category?

24 A Have we ever modified our pricing to compete with

25 another product in the men's shaving category? We

159

1 have offered promotions and we've worked with

2 retailers to drive promotional pricing at times to

3 drive excitement and consumer take-away.

4 Q What kind of promotions?

5 A Last December we dropped the national FSI.

6 Q What is the national FSI?

7 A Freestanding inserts, it's the coupons you get in your

8 Sunday newspaper and on that coupon or on that FSI we

9 communicated an offer to consumers to go to buy any

10 Remington product at retail of X value and send in the

11 appropriate documentation by the required deadline,

12 receive a \$10 check back by mail.

13 Q And did that apply to the cleaning center products?

14 A Yes, but not exclusively.

15 Q What was the motivation for that promotion?

16 A It's a promotion we have done in the past and found it

17 to be an effective way to generate some holiday,

18 consumer holiday excitement to our product.

19 Q So that wasn't done in response to a specific

20 competitor product or a competitor initiative?

21 A That particular one was not done directly in response

22 to a competitor, no.

23 Q Have there been others that were done directly in

24 response to a competitor?

25 A I'm trying to think on the men's shaving category. At

160

1 various times we will, as I mentioned, work with an

2 account on temporary price reductions, you know, where

3 instead of giving the consumer a back by mail

4 opportunity, we'll give them an instant savings

5 opportunity at the register and we'll run those with

6 retailers at times to generate excitement and

7 potentially to combat competitive pricing activity in

8 the marketplace.

9 Q Do you ever engage in a temporary price reduction on

10 any of the cleaning center products?

11 A I believe it was on rollback last year at Wal-Mart

12 during the holiday season.

13 Q What does rollback mean?

14 A That's Wal-Mart's term for a temporary price

15 reduction.

16 Q And why was that done?

17 A Working with the buyer on an overall category strategy

18 to develop a program with the buyer that made sense

19 for our products and their category and their

20 consumers. It was one component of our overall

21 program as a supplier of Remington products.

22 Q Has Rayovac ever modified its pricing specifically to

23 compete with Braun on men's shaving products?

24 A Not that I'm aware of.

25 Q And you would be aware if it had happened within the

161

163

1 last, since, say, 2003?

2 A Certainly if it had happened on a large scale basis, I

3 would more than likely be aware of that. If it

4 happened at an account level, say, for example, a

5 competitor goes on rollback and we're out there at a

6 \$5 price premium, we might negotiate and try and get a

7 similar rollback just to maintain a price parity.

8 Examples like that, I wouldn't work on every one of

9 those examples certainly.

10 Q Who would?

11 A The individual business analyst responsible for the

12 account would work with the sales team.

13 Q Would Sean Martin be aware of that?

14 A Depending upon the size of the account, yes, he

15 would. For smaller accounts, no, but for some of our

16 larger customers, Sean is supposed to be brought in to

17 the channel, brought into the loop if the channels are

18 followed properly.

19 Q Just look at the last page of this document.

20 A This document being No. 39?

21 Q Yes. How were these numbers for pricing set?

22 A How were these specific numbers set for pricing?

23 Q Yes.

24 A I wasn't involved in setting these, but I would

25 speculate they were set in the same fashion we set

162

1 them at Rayovac looking at the competitive landscape,

2 marketplace, features and benefits, what we see as

3 coming out with in the upcoming time frame, what

4 retailer margin expectations are.

5 Q Jim Doyle is the person to talk to on that?

6 A He would probably be the best person on that.

7 Q We talked earlier about the packaging of the various

8 or essentially the four products that incorporate a

9 cleaning center, and it includes a shaver and the

10 cleaning base. Is there anything else included in

11 that package?

12 A I'm confused when you say four SKUs.

13 Q I'm sorry, not SKUs, the four products, the R-9500,

14 the MS-5500, the MS-5700 and the WDF-7000.

15 A Okay. I can speak to the first three.

16 Q Okay.

17 A The R-9500, the MS-5500 and the MS-5700, basically

18 it's the shaver along with a cord and a cleaning base,

19 a bottle of cleaning fluid and a filter for the

20 cleaning system.

21 Q And the consumer then has to assemble the product?

22 A I don't know what you mean by assemble.

23 Q For example, they have to place the filter into the

24 cleaning system?

25 A The filter is separate from the cleaning system, and

1 Q Why not?

2 A The two are designed to integrally work together.

3 Q Is marketing involved in the decision to sell the two

4 products together?

5 A Yes.

6 Q Why was it decided to sell the products in this way?

7 A Not being privy to the exact discussions that

8 surrounded the strategy on that, I would speculate

9 that, as I mentioned before, the two products work

10 integrally together. A cleaning shaver without a

11 cleaning base defeats the purpose of having a cleaning

12 shaver. A cleaning base without a cleaning shaver

13 defeats the purpose of having a cleaning base.

14 Q But at the time, for example, the R-9500 was

15 introduced, you had rotary shavers on the market,

16 correct?

17 A Correct.

18 Q Why was it decided or why was it considered preferable

19 to create a new shaver to specifically work with the

20 cleaning basin rather than simply come out with a

21 cleaning basin that was compatible with the existing

22 rotary shavers?

23 A Existing rotary shavers would have had to have been

24 retrofitted for the cleaning system. Our system

25 requires there to be holes in the shaver itself for

164

1 the cleaning fluid to be jetted into the shaver heads
2 to be properly cleaned. Consequently, no existing
3 shaver that we had in the marketplace would have
4 allowed that functionality with our cleaning base.
5 Q Have there been any freestanding either rotary or foil
6 shavers introduced since the R-9500 or the MS-5500 or
7 5700 came out?

8 MR. UELAND: Can you repeat that
9 question, just read it back.

10 (Reporter reads back last question)

11 A Yes.
12 Q And were those products designed with the holes for
13 cleaning fluid?
14 A No, one of the products specifically is a travel
15 shaver.
16 Q Was it ever considered to on a going forward basis
17 include these holes in all shavers going forward?
18 A Not that I'm aware of, and I believe it would present
19 a significant design concern in order to do that
20 because of the - in terms of the fit of the overall
21 shaver into the cleaning system, it's more than just
22 the holes in the head that have to be there to make it
23 work as part of the system.
24 Q So the design of the shaver is impacted beyond simply
25 adding these holes for the cleaning fluid?

1 A Yes, I can't imagine they wouldn't have been involved
2 with a strategy like that. Any company marketing is
3 going to be involved with a significant product
4 launch.
5 Q What was the motivation behind Remington's at the time
6 entry into the market for cleaning systems?
7 A Remington's motivation for getting into the cleaning
8 systems could very well have been rooted in continuing
9 to cascade the levels of features and benefits that
10 are offered in a shaving system and to deliver to
11 certain price points.
12 Q At the time Remington entered the market for cleaners,
13 what other products were featuring or had the feature
14 or benefit of the cleaner?
15 A The Braun products.
16 Q Anything else?
17 A Those are the only ones that I'm aware of.
18 Q And was the Braun product considered successful?
19 A Yes.
20 Q Was it successful financially in terms of sales? I'm
21 sorry. Withdraw the question. It was obviously
22 successful because it was selling. Was it also
23 successful as an idea for people to clean shavers?
24 A I don't know that that idea per se was successful,
25 although concept testing said that people thought the

1 A It could potentially be. Again, I'm not the design
2 expert.
3 Q But as you understand it, there were logistical or are
4 logistical complications that would preclude
5 manufacturing all shavers with these holes?
6 MR. UELAND: Object as being
7 outside the scope of the topics the witness has
8 been designated for.
9 A I'm sorry, I'm confused with the question.
10 Q You indicated that as you understood it or that one of
11 the reasons that the shavers weren't manufactured on
12 an ongoing basis with the holes for the cleaning fluid
13 was that it presented design difficulties, is that
14 correct?
15 A It adds a level of design that would need to be taken
16 into account, yes.
17 MS. WOLF: Take a break for five
18 minutes.
19 (A short recess is taken)
20 MR. UELAND: Back on at 3:10.
21 Q Was the marketing department involved in the original
22 development of the Rayovac cleaner?
23 A The marketing department involved in the Smart System
24 cleaning systems?
25 Q Yes.

1 cleaning system was a convenient feature to have in a
2 shaver. It made sense as a feature to offer.
3 Q You mentioned concept testing. Was concept testing
4 done prior to Remington's development of the cleaning
5 system?
6 A I believe it was, yes. It's referenced in this
7 document that you had given me, document No. 39 speaks
8 to that.
9 Q Document No. 36 under No. 3 --
10 A On the first page?
11 Q Yes. Have you ever seen this inside product
12 development study?
13 A I believe you asked that earlier.
14 Q The answer was?
15 A Not that I'm aware of.
16 Q In relation to that it mentions a high concept score.
17 What does that mean in sort of marketing parlance?
18 A Whenever you're testing something with consumers,
19 you'll test a concept, and if the benefit or feature
20 that the consumer is getting is something that is of
21 interest to them, of high interest to them, it will be
22 a high concept score.
23 Q And in this instance it's referring to cleaning
24 receiving a high concept score?
25 A Specifically on No. 3, fully automated

169

171

1 cleaning/charging system will provide the user with a
2 fully cleaned and charged shaver. Further, the
3 concept received the highest scores in our recent
4 external research program. The concept of the entire
5 system scored high.

6 Q In development of the product, did Remington measure
7 the success and goals against Syncro, against Braun's
8 Syncro product?

9 MR. UELAND: Did they measure what?

10 MS. WOLF: The success and
11 benchmark its goals against Syncro testing.

12 A In terms of what types of Syncro testing?

13 Q Let me rephrase that. I'm sorry. It was poorly
14 phrased. In development of the product, of its own
15 product, did Remington perform tests on Syncro
16 shavers?

17 A What type of tests?

18 Q Did, for example, it compare its own development of a
19 cleaning solution to Braun's cleaning solution?

20 A I don't know that we would have specifically compared
21 ourselves to Braun's cleaning solution.

22 (Exhibit 40 is marked for identification)

23 Q Take a moment and look that over.

24 (Witness examining document)

25 A Okay.

170

1 Q Paragraph 2(a), the last sentence indicates that, "I
2 am only interested in making claims associated with
3 cleaning the actual shaver that is part of the package
4 sold with the cleaning base similar to the," blank,
5 "of Braun," and then paragraph 6 again repeats, "Same
6 as Braun, with perhaps the opportunity to come in
7 under them." Do you know why -- let me go back a step
8 actually before that. Yuri Avila we talked about.
9 Who is Yuri Avila? His name has come up.

10 A Yuri Avila came to us from Remington, and he is our
11 leader of technology, R&D on men's shaving, on shaving
12 systems.

13 Q You stated earlier you don't know who Peter Katz is,
14 correct?

15 A Correct.

16 Q Who is Jeff Hovis?

17 A Again I do not know. It appears from the salutation
18 at the bottom Jeff is from somebody other than
19 Remington.

20 Q And Jim Doyle we have also talked about, correct?

21 A Um-hum.

22 Q Under 2(a) it looks like we think these were probably
23 in different colors at one point in time. Under 2(a)
24 on Exhibit 40, "Please see my comments below," Peter
25 says again "interested in making claims associated

1 with the shaver similar to that of Braun," and same as
2 Braun in paragraph 6 "with perhaps the opportunity to
3 come in under them." Why was he interested in making
4 his product like Braun's?

5 A As you read through this document, it appears we had a
6 choice to make. We could have either made claims
7 relative to the cleaning solution to directly talk
8 about a household type cleaner or we could have made
9 claims that said moisturizes your face and other
10 claims. Had we chosen the latter path, it would have
11 presented an additional regulatory application we
12 would have had to have gone through and brought a
13 whole other regularity agency in from the government,
14 and so Braun obviously or Braun must have seen similar
15 complications in this and chosen that path and not
16 necessarily following Braun's lead but looking at the
17 complication of claiming the benefit to the consumer
18 for skin conditioning and whatnot would not warrant
19 all the extra effort and time and so on to get that
20 application with the FDA.

21 Q Was it an important consideration that Braun had not
22 pursued the latter option as you described it?

23 A I don't believe that it was an important
24 consideration. If it had been a feeling that had been
25 a concept that had tested high in terms of skin

172

1 conditioning as an added benefit of the cleaning
2 system, I'm not sure it would have mattered at all
3 where Braun was.

4 (Exhibit 41 is marked for identification)

5 Q Take a quick look. I have a couple questions.

6 (Witness examining document)

7 Q Under the section called Findings and Indicated
8 Actions there is an item No. 2 in Exhibit 41 which is
9 2003 business review of men's shavers. What is that
10 second finding?

11 A Second finding under No. 2 as in --

12 Q On page R 12432.

13 A Yes, what section of two were you questioning?

14 Q Section 2 is entitled what?

15 A Section 2 as it's reading straight off of the sheet?

16 Q Sure.

17 A "We must launch a new high-end shaver with a cleaning
18 system."

19 Q And just underneath that on section A it talks about
20 the Syncro cleaning system, correct?

21 A Yeah.

22 Q And most of the section of Exhibit 41 is a comparison
23 or a discussion of Braun's Syncro system, correct?

24 A Most of the section of -- this section of Exhibit 41?

25 Q Yes.

173 MR. UELAND: Did you say just

2 section 2?

3 MS. WOLF: Yes.

4 A It talks about the Syncro in here and it also talks
5 about the cleaning system not necessarily specific to
6 Syncro.

7 Q Is this a typical way that a new product might arise?

8 MR. UELAND: Objection, vague as to
9 what you mean by typical.

10 A Do you mean by looking at consumer testing and so on
11 and so forth?

12 Q In deciding whether to develop a new product, is the
13 success of a competitor of a similar product
14 considered?

15 A As we launch new SKUs, the success of our SKUs and
16 consumer testing certainly play into it. The success
17 of SKUs in the category would play into understanding
18 what's driving consumer behavior.

19 Q Is it standard in developing a new product to
20 specifically study the products of a competitor?

21 A At some point or another we need to study the products
22 of a competitor at a bare minimum to ensure we're not,
23 you know, in patent violation.

24 Q Is it standard to run consumer tests with competitors'
25 products?

174 A We'll run focus groups at times with our products and
2 competitive products. The Scout research that's
3 referred to in here is more of a broad market base
4 that tries to understand the behavior of the consumer
5 and are they a blade shaver, electric shaver, are they
6 solely electric or those types of things more across
7 the shaving category in general than specific to a
8 given competitor per se.

9 Q Would Rayovac or Remington have commissioned this
10 Scout work?

11 A We work with Scout basically on an annual basis.
12 Scout pulls together information for trends in the
13 category. I believe they have been doing it annually.

14 Q You mentioned that at some point you have to study a
15 competitor's product specifically related to patents.
16 Are there other reasons that you would study a
17 competitor's product?

18 A Yes.

19 Q And what would those reasons be?

20 A Understand what features and benefits, as any business
21 selling a product, you would want to understand what's
22 in the marketplace and what you're selling against.

23 Q Is it important to see what features of an existing
24 successful product people like and don't like?

25 A Again with any product in any company, anytime you're

175 launching a product you want to know what's driving
2 the success of it.

3 Q And once you have identified what's driving the
4 success of a product, is it then standard form to copy
5 those features that are designing the success of the
6 product or driving the success of the product?

7 A Not necessarily.

8 Q If certain features are driving the success of a
9 product, why wouldn't Rayovac incorporate them into
10 its own product?

11 A Could be a variety of reasons, one would be if it's a
12 direct patent infringement, obviously we would not
13 look to copy verbatim. Additionally, there may be
14 ways that we can take an existing product feature and
15 modify it slightly that it actually turns into a
16 better consumer benefit.

17 Q So one way to do that would be to, quote unquote,
18 improve upon the existing product in the market?

19 A Improve upon it or offer a different variation of it
20 perhaps.

21 Q You don't want to copy an existing product verbatim
22 because of patent concerns. Does marketing direct
23 design or engineering staff to design around patents?

24 A Not that I'm aware of.

25 Q Does marketing identify specific features that it

6 wants included in a new product?

2 A Yes.

3 Q Was one of those features with regard to the R-9500
4 that marketing wanted a cartridge for cleaning fluid
5 rather than a cleaning fluid container?

6 A I don't specifically know that. Without reviewing
7 history, I do not know that.

8 Q If you could look at Exhibit 36 for a moment under
9 No. 5, Product Definition.

10 (Witness examining document)

11 Q After reading No. 5, does that refresh your
12 recollection as to whether or not marketing originally
13 contemplated that the R-9500 would use a cartridge?

14 A According to this form, it does indicate the original
15 product definition would in fact have a cartridge
16 replacement.

17 Q Why was marketing pushing the use of a cartridge?

18 A I don't know. I mean from reading one of the other
19 exhibits you had given me, there was talk about
20 spilling. In the previous document you had given me,
21 document No. 41, under the exact section we were
22 reviewing, cleaning solution has a tendency to spill
23 may have been the reason why they were pursuing a
24 cartridge.

25 Q Do the Rayovac products, cleaning products use a

177

179

1 cartridge for cleaning fluid?

2 A No.

3 Q Why not?

4 A I don't know. We deliver it in a bottle with a sealed
5 top and replaceable filter.

6 Q Who would know why the decision was made not to use a
7 cartridge for cleaning fluid?

8 A I don't know if Yuri might know that.

9 Q Who would be involved in a final decision as to
10 whether or not to use a cartridge for cleaning fluid?

11 MR. UELAND: Objection, outside the
12 scope of the topics the witness has been
13 designated for.

14 A You would believe that any product designs would be
15 evaluated at any company with marketing and design
16 input.

17 Q At some point in product development does the legal
18 department also review a product?

19 MR. UELAND: You can answer that
20 yes or no.

21 A Yes.

22 Q At what stage of the development does the legal
23 department become involved?

24 MR. UELAND: I instruct you not to
25 answer that question on the basis of privilege.

178

1 MS. WOLF: What is the privilege?

2 MR. UELAND: I think that --

3 MS. WOLF: There is no
4 communication involved at what point they become
5 involved.

6 MR. UELAND: I think that the point
7 at which they get involved could implicitly reveal
8 legal advice or an attorney-client communication
9 that would effectively reveal the substance of the
10 communication, so my objection and instruction
11 stands.

12 MS. WOLF: I'll ask again. I fail
13 to see the basis of how time --

14 Q Is it early in the process when the legal department
15 becomes involved --

16 MR. UELAND: Objection, instruct
17 him not to answer.

18 Q -- or evaluates a product?

19 MR. UELAND: Don't answer the
20 question.

21 MS. WOLF: Just let the record
22 reflect that there is no valid basis for the
23 privilege and that we will be asking future
24 witnesses similar questions and, if necessary,
25 we'll get a ruling to that effect.

1 MR. UELAND: Go get your ruling.

2 Q Let me ask you this. Have you ever met with an
3 attorney regarding a design for a new product?

4 MR. UELAND: You can answer that
5 question yes or no.

6 A Can you repeat the question. I'm sorry.

7 Q Have you ever met with an attorney, either inside or
8 outside counsel, with regard to the introduction of a
9 new SKU, a new product?

10 MR. UELAND: Lesley, just to
11 clarify, do you mean any SKU along Rayovac's
12 business or do you mean --

13 MS. WOLF: I mean any SKU.

14 MR. UELAND: Then I object on the
15 grounds of relevance as well, but you can answer
16 the question yes or no.

17 MS. WOLF: The witness can answer
18 the question. Note your objection to form.

19 A I believe that I have, I'm just struggling to recall
20 the exact circumstances.

21 Q Is it a standard part of the process or were these
22 unusual -- I don't want to know what the circumstances
23 are. I'm just curious if these were unusual
24 circumstances that gave rise to this meeting or is it
25 part of the normal course of development?

180

1 A As part of the normal course of development, again
2 whether it's a battery, it's a shaver, it's a
3 whatever, legal is involved whether we're making a
4 claim or we're concerned about a patent infringement.
5 Legal will be involved in that early on so we don't
6 end up with a product that's not salable.

7 (Exhibit 42 is marked for identification)

8 Q Just take a moment to look at it.

9 (Witness examining document)

10 Q What is Exhibit 42?

11 A Tested benchmark concepts.

12 Q And what is a benchmark concept?

13 A When you test the concepts of a product.

14 Q How are particular benchmarks selected?

15 A Particular benchmarks may be selected on the basis of
16 similar features and/or at times different features,
17 although I'm not specifically involved with that on a
18 regular basis.

19 Q Who is involved with selecting benchmarks, is that a
20 function of marketing?

21 A Marketing, like a Sean Martin.

22 Q I don't see a date on this document. When was this
23 document made?

24 A I don't know.

25 Q Do you know for whom it was made?

1 A No.

2 Q Does this look more like a pre-Rayovac document?

3 A Yes.

4 Q Again Jim Doyle is probably the person to talk to

5 about that?

6 A Yes.

7 Q I just have one question, and that's on page 3, what

8 does PI mean?

9 A Purchase intent.

10 Q Which is defined as what?

11 A The consumer's purchase intent, would you be likely to

12 buy this product.

13 Q Is that a standard measure?

14 A Yes.

15 Q Since the development and introduction of the cleaning

16 center products, does Rayovac continue to use Braun's

17 products as benchmarks for marketing decisions?

18 A As benchmarks for concept testing?

19 Q Let's start with concept testing.

20 A Benchmark for concepts? As we do a focus group, we

21 would do -- it would not be limited to just Rayovac or

22 just Rayovac and Braun, it would be Remington and

23 other competitors as well, not necessarily exclusively

24 Braun or Norelco.

25 Q Are benchmarks sometimes used in marketing a product?

1 A I don't know what you mean by that.

2 Q In selecting how to market a product, are these

3 products which have been identified as having similar

4 features used in sort of direct comparison to the

5 Rayovac product?

6 A We do not make any claims to my knowledge in direct

7 comparison of our products versus competitors'

8 products to the consumer.

9 Q Going back to Exhibit 41 -- I'm sorry, not 41,

10 Exhibit 39, page R 12420, look under the section

11 that's high-end foil and rotary shavers with cleaning

12 system, just take a look at that.

13 (Witness examining document)

14 A Okay.

15 Q It describes something called a fact-based selling

16 approach. Does that have some official marketing

17 meaning?

18 A I don't know that it's an official marketing meaning

19 trademarked to Rayovac or Remington. The fact they're

20 selling is no secret in the industry. Fact-based

21 selling entails pulling out facts of what's going on

22 in the marketplace.

23 Q Is there another type of selling that fact-based would

24 be contrasted with?

25 A I guess fact-based probably gets to more of what's

1 going on in the marketplace more so than, say, just

2 going in and selling your product and not doing any

3 comparisons and so on.

4 Q And did part of this fact-based selling approach

5 highlighted in Exhibit 39 refer to the Syncro product?

6 A Um-hum.

7 Q And what were those facts surrounding the Syncro

8 product that were supposed to be highlighted?

9 A As it says in this sheet here, show how successful the

10 Braun Syncro has been over the past two years, and

11 that's basically it.

12 Q Does it mention that Rayovac has improved the cleaning

13 concept or Remington has improved the cleaning

14 concept?

15 A It does mention that.

16 Q And what are those improvements to the cleaning

17 concept?

18 A I don't know specifically the improvements that we

19 have made.

20 Q Is that a question for Yuri?

21 A Yes.

22 Q Is it an unusual position to try to sell your product

23 by talking about the success of a competitor's

24 product?

25 A Not at all. In addition to fact-based selling, you

1 may have heard the term category management, which

2 retailers absolutely love, retailers expect you to

3 come in and understand what's happening in the

4 category, what you can provide to them, whether you're

5 selling batteries, flashlights, shavers or hair

6 dryers, that will help them complete their category

7 and offer their consumers a complete category, so it's

8 not at all uncommon.

9 Q How would it help sell Rayovac's products to talk

10 about the success of the Syncro?

11 A Success of the Syncro defines that there is a market

12 that is available at this price point, and with any

13 category many times consumers are looking for a choice

14 at a given level, and so good category management

15 might say that success by one vendor doesn't mean that

16 that's necessarily the best for the retailer or the

17 category. Success by one vendor may very well mean

18 that through good category management there is room

19 for more than one vendor and it makes great sense for

20 the consumer choices and the retailer to complete

21 their category.

22 Q It talks about arming the sales force with

23 information. To that end would the sales force be

24 provided with written materials?

25 A Similar to the documents we had gone through before,

185

1 yes.

2 Q Which documents?

3 A Document No. 38, examples such as this may have been

4 conveyed to the sales force in a written format.

5 Certainly they would have been available, you know, in

6 a presentation for them. I mean as you read through

7 this, there are many good selling facts that are good

8 for fact-based selling.

9 Q Is the sales force ever given handouts or things to

10 leave with retailers --

11 A Yeah.

12 Q -- summarizing this?

13 A Yes.

14 Q What kinds of things would they be given?

15 A Commonly referred to as sell sheets, I believe I saw

16 some examples of those in -- examples might be page 28

17 in Exhibit 38, R 13609. Basically this type of

18 information may not be exactly this format, but this

19 type of information where it shows a picture of the

20 product, the features of the product, the suggested

21 retails of the product and things like that would be

22 available because as you meet with your buyer, you

23 would want to be able to share with him or her what's

24 coming forth and have a leave behind for them so they

25 don't forget about your product after you leave.

186

1 Q And are sell sheets something that are distributed by

2 corporate, for example, Sean Martin or do your sales

3 representatives make that their own?

4 A I'm trying to recall if we have an on-line version of

5 those. I think we went -- I can't recall if we went

6 to the strictly on-line version or if we have both

7 hard copy and on-line versions of those available.

8 Q Where would the on-line versions be available,

9 somewhere where retailers could go see them?

10 A No, no, certainly someone in our organization would

11 have to -- someone affiliated with Rayovac would have

12 to get access to those sheets.

13 Q And have all of those sheets been produced to counsel

14 in this action?

15 A I don't know that answer.

16 Q Sean Martin or Jim Doyle would know the answer to

17 that? They would have access to that information?

18 A Assuming they would have access to that information, I

19 don't know that specific sales sheets were requested.

20 MR. UELAND: I think we have

21 produced those documents.

22 A Like I say, it's the type of information that we

23 referred to here in Exhibit 38.

24 Q When something is considered a benchmark, is that

25 somehow indicated it's considered to be a superior

187

1 product?

2 A Not necessarily. Benchmark just is a benchmark

3 against which to measure.

4 Q Would you measure yourself against something that you

5 thought was a bad product?

6 A Most likely not.

7 Q There is something called an NPD team. What is the

8 NPD team?

9 A NPD, that's different from National Panel Diary. NPD

10 I believe would be new product development.

11 Q And who is all on the NPD team?

12 A NPD at our organization is a combination of R&D type

13 people and marketing research type people kind of

14 brought together to learn consumer wants and needs,

15 and so those are the types of people that would be on

16 it. I don't know if you want specific names.

17 Q Specific names would be great.

18 A Michael Vaszily, Mike, it's V-a-s-z-i-l-y, I don't

19 think that's right, but it's close. I'm trying to

20 think of others in that area. Just specific to

21 Remington products, I mean Katie Ryan is up there. I

22 believe she works on Rayovac products. John Fritz is

23 in that area. Mark Zander heads it up. Courtney

24 Whittle again I think is focused on Rayovac products

25 last I knew.

188

1 Q Are these people whose sole job it is to be part of

2 the new product development team or do they have other

3 functions at Rayovac and it's just like a committee

4 that meets?

5 A Those folks' sole purpose in life with our

6 organization is to understand and work on developing

7 new products.

8 Q And do they work across all Rayovac products or are

9 they focused -- you mentioned a couple people who were

10 focused on Remington products?

11 A Michael Vaszily is certainly focused on Remington

12 products. A previous person that used to be in that

13 organization who subsequently moved on to a different

14 role, I don't know if they back rolled her position,

15 but she was also on the Remington products. Courtney

16 last I knew was on Rayovac products as well as Katie,

17 but that can change.

18 Q Rayovac or Remington?

19 A Rayovac, like as in batteries or flashlights.

20 Q So when you say Remington products, those are shaver

21 folks?

22 A Shaver, groomer, dryers, Remington products.

23 Q Clothes shavers?

24 A Exactly, Fuzz-Away.

25 Q To what extent do they drive what new products are

1 developed, do they play a significant role?
 2 MR. UELAND: Objection, vague as to
 3 what you mean by significant.
 4 A Do they play a significant role in the development
 5 of --
 6 Q For example, do they come up with initial ideas or do
 7 initial ideas come out of the engineering department
 8 or research and development?
 9 A Initial ideas can come from absolutely anywhere. I
 10 mean even as an accountant, occasionally I will have
 11 an initial idea I can share with the organization.
 12 Q And if you had such an idea, would you go to new
 13 product development with it?
 14 A I would either go to them or I would go to the
 15 marketing team and see if they thought it was a worthy
 16 idea.
 17 (Exhibit 43 is marked for identification)
 18 Q Take a minute.
 19 (Witness examining document)
 20 A Is there a specific area you would like me to review?
 21 Q My first question is actually this Exhibit 43 is
 22 entitled Men's 2006 Shaving and it is dated
 23 September 29th, 2004. Is it typical to be working a
 24 year and a half ahead or so on products, new product
 25 development?

1 A New product development, yes, will work -- they can
 2 work at various different levels into the future.
 3 Q Do you know who this recommendation was given to?
 4 A This recommendation, looking at this recommendation,
 5 it appears it was given to senior management.
 6 Q What makes you say that?
 7 A Just in the structure, the timing of the document and
 8 the structure of it coinciding with our year end and
 9 the structure of the document.
 10 Q Look at page marked R 002554.
 11 A Eye chart.
 12 Q Oh, pie chart.
 13 A Eye chart.
 14 Q Eye chart. Got you. There is a pie chart on the
 15 previous page somewhere in another document I have
 16 seen. Sorry. This page talks about feasibility
 17 ratings. What is a feasibility rating?
 18 A A feasibility rating get out of work in NPD directly,
 19 but a feasibility rating would make sense as, you
 20 know, is it technically feasible, in other words, can
 21 we produce the product, and as I read across and read
 22 cost wise, can we produce the product at a targeted
 23 cost that will meet a targeted price point with a
 24 targeted retail and leave room for margin for us in
 25 the retail in there, and then feasibility from the

1 consumer standpoint would make sense of is this
 2 something the consumer is interested in, would they
 3 buy.
 4 Q Do you know what it means, the left-hand column lists
 5 a bunch of products under concept board and included
 6 in that is Braun's Syncro System Shaver. Why would
 7 that be a part of a concept board?
 8 A I don't know.
 9 Q This page is dated September 22nd, 2004, correct?
 10 A That's the date that's printed on the page.
 11 Q So at this point the Syncro system was in existence,
 12 correct?
 13 A Correct.
 14 Q Had Rayovac introduced the foil shavers with the
 15 cleaning system at this point?
 16 A Yes.
 17 Q So why was Rayovac still conducting feasibility
 18 studies?
 19 A I don't know. This page appears to be geared toward
 20 rotary shaving because it says rotary in the heading
 21 and rotary concepts, and the products we're discussing
 22 are foil shavers. I mean the products you're asking
 23 about are foil shavers.
 24 Q But they're included on this page, correct?
 25 A The Braun Syncro is included on this page, that's

1 correct. Our foil shaver is not.
 2 (Exhibit 44 is marked for identification)
 3 (Witness examining document)
 4 Q I'll be asking you about page 3.
 5 A Page 3 that's numbered page 5 as the fax header?
 6 Q Page 6 of the fax header, the Syncro System Shaver.
 7 Exhibit 44 is a concept test. What is a concept test?
 8 A Forty-four, where are you --
 9 Q I'm sorry, the exhibit in general is entitled concept
 10 test on the first page.
 11 A What is a concept test?
 12 Q Yes.
 13 A Concept test is not unique or specific to men's
 14 shaving. It's viewing a concept for a new product or
 15 is there an existing product in the marketplace, how
 16 does that concept test with consumers.
 17 Q And why was this concept test performed or
 18 commissioned by Rayovac?
 19 A I don't know. It's not uncommon for us to do, as you
 20 see in this document, concept testing on multiple
 21 SKUs, and if you flip back to page 1, as we look at
 22 concept testing, you'll note there are seven different
 23 products in here, two from Braun, two from Norelco and
 24 three from ourselves, just to understand how consumers
 25 are viewing the product offerings and the concepts

193

195

1 available in the category.

2 Q And how were the products selected that go into this?

3 A Products would be selected that go into this by the
4 marketing management team.

5 Q So Synovate doesn't select the products, someone at
6 Rayovac selects the products?

7 A Someone at Rayovac would select the products.

8 Q And how is a concept test then utilized by Rayovac?

9 A Concept test would be utilized to gain insight into
10 consumer wants and desires.

11 Q Is it used for new product development?

12 A It can be.

13 Q Is it used for marketing and advertising purposes?

14 A It can be, although -- it could be.

15 Q What else is it used for?

16 A Decisions about whether to continue with a product or
17 decisions about which direction to take a product.

18 Q When you say which direction to take a product, what
19 do you mean by that?

20 A We might have three features that we can put in a
21 shaver. Hypothetically let's say they all cost a
22 dollar to add. You might ask the consumer which is
23 more important to you, an LCD panel, worldwide voltage
24 or a pop-up trimmer foil, and does it dramatically
25 impact your intention to buy this product and so on,

194

196

1 so forth, so you gain interest in terms of which
2 features you ultimately want to leave into the product
3 because if worldwide voltage, for example, is not
4 important to the consumers, then why spend the money
5 on adding that feature into the product. We're not
6 going to maximize the consumer value by doing that.

7 Q Are these done on a periodic basis or is there
8 specific motivation behind them?

9 A I don't know.

10 Q Is this something that marketing decides to go forward
11 with?

12 A Correct. I mean in general keeping in touch with
13 concepts in the marketplace again is not unique or
14 specific to the shaving category and keeping in touch
15 with consumer perceptions about those concepts.

16 Q Are advertising and marketing decisions made with an
17 eye towards what a competitor is doing in a
18 marketplace?

19 A No.

20 Q It's not a factor?

21 A I wouldn't say it's not a factor, but it's not the
22 focus.

23 Q What is the focus?

24 A The focus is on maximizing our brand equity and
25 building brand loyalty.

1 Q So brand loyalty is important in the men's shaving
2 industry?

3 A Yes.

4 Q Would the success of a competitor's product cause you
5 to spend more on advertising, whether it was to build
6 brand equity or increase brand loyalty, if someone
7 made significant gains of market share or launched a
8 new successful product, would Rayovac spend more on
9 advertising in a given market?

10 A I believe we discussed that earlier relative to the
11 ways to combat competitive situations.

12 Q And you would, things like end aisle displays?

13 A It is a tool that is available to us. But what did
14 you say, things like what?

15 Q The aisle end displays.

16 A Oh, sure, it is a tool that's available to us, like a
17 consumer promotion would be or creating a temporary
18 display, and again that advertising should that be
19 chosen as the avenue, the intent is to build Remington
20 brand equity and build equity into. If you have
21 noticed in our advertisements, it focuses on Titanium.

22 Q Are there any ads that Remington has used since 2003
23 that compare its men's shaving products directly with
24 those of the competitor?

25 A Direct comparison with those of a competitor, i.e.,

1 named competitor?

2 Q Start with an unnamed competitor.

3 A No, I mean there is no direct comparison of our
4 products in terms of saying ours does this while
5 somebody else's does that.

6 Q What do the ads say generally?

7 A What do the ads say?

8 Q I'll withdraw that. In creating ads, what features of
9 Rayovac's products are focused on?

10 MR. UELAND: Objection, overbroad.

11 A Since the launch of our Titanium line, all of our
12 advertisements have had a heavy theme building on the
13 brand equity of Titanium.

14 Q When was the Titanium launched?

15 A I don't know that specific date, 2002 or 2003.

16 Q Would it have been early 2003?

17 A Again, I don't know, but the Titanium was in the
18 marketplace before the cleaning systems were in the
19 marketplace. The focus of our advertising since the
20 Titanium has been in the marketplace has been
21 Titanium.

22 Q Is the research and development budget affected by the
23 introduction by competitors of your products?

24 A Meaning if competitors come out with a strong new
25 product offering, do we allocate more money to R&D?

197

1 Q Yes.

2 A Generally not.

3 Q Are there exceptions to that?

4 A I'm not aware of any.

5 MS. WOLF: If we could just take a
6 quick break, we may be done. I just want to look
7 over my notes and see if there is anything else.

8 (A short recess is taken)

9 MS. WOLF: I actually have no
10 further questions at this time.

11 MR. UELAND: I don't have any
12 questions for the witness either.

13 (4:20 p.m.)
14
15
16
17
18
19
20
21
22
23
24
25

198

1 STATE OF WISCONSIN)
2)ss.
3 COUNTY OF DANE)

4 I, ELIZABETH J. KERNEN, a Notary Public in and for
5 the State of Wisconsin, do hereby certify that the above
6 deposition was taken before me at the offices of Lathrop
7 & Clark, LLP, Attorneys at Law, 740 Regent Street, in the
8 City of Madison, County of Dane and in said State, on
9 May 12, 2005, commencing at 9:00 o'clock a.m.; that it
10 was taken at the request of the plaintiff, upon verbal
11 interrogatories; that it was taken in shorthand by me, a
12 competent court reporter and disinterested person,
13 approved by all parties in interest, and thereafter
14 reduced to writing by me using computer-aided
15 transcription; that said deposition is a true record of
16 the deponent's testimony; that said deposition is to be
17 used in the above-entitled action now pending in United
18 States District Court for the District of Massachusetts;
19 that the appearances were as shown on page 4 of the
20 deposition; that reading and signing was not requested;
21 that the said ALAN SCHOEPP, before examination, was sworn
22 by me to testify the truth, the whole truth, and nothing
23 but the truth relative to said cause.

24 Dated May 20, 2005.
25

Notary Public, State of Wisconsin

199

approach

-	actuals (52:24)(54:2)	(102:23)(103:23)(138:20)(138:21)
-- (59:9)	adams (50:5)(50:6)	(162:18)(179:11)
A	add (29:20)(145:24)(193:22)	already (19:24)(49:12)(65:18)(67:10)
abbreviation (97:13)	added (62:9)(71:19)(102:19)(133:9)	(103:16)(107:13)(127:18)
able (23:7)(33:15)(85:16)(86:14)	(172:1)	alter (140:15)
(185:23)	adding (165:25)(194:5)	alternative (82:22)
above (4:22)(46:3)(46:16)(46:19)	addition (36:23)(56:5)(133:14)(183:25)	although (51:7)(115:5)(118:24)
(46:22)(49:17)(120:9)(123:24)(144:9)	additional (37:1)(37:3)(48:6)(58:19)	(127:21)(132:19)(157:5)(167:25)(180:17)
(153:21)(198:4)	(60:12)(62:2)(171:11)	(193:14)
above-entitled (4:3)(198:16)	additionally (80:24)(175:13)	always (20:9)(20:17)(93:12)(119:13)
absolutely (100:22)(184:2)(189:9)	adds (115:18)(166:15)	america (2:4)(2:5)(16:8)(48:11)(48:19)
access (25:14)(25:15)(25:18)(25:20)	adhered (78:24)	(52:2)(52:5)(121:14)
(27:19)(69:16)(71:22)(75:3)(77:4)(86:12)	administrative (135:16)	american (10:6)(11:1)(12:13)(12:18)
(117:14)(124:9)(124:17)(154:11)(186:12)	ads (89:22)(89:25)(90:2)(195:22)	(16:5)(16:15)(26:15)
(186:17)(186:18)	(196:6)(196:7)(196:8)	among (54:23)
accessories (18:1)(97:22)(103:22)	advance (19:2)(19:7)(19:11)(49:14)	amongst (114:2)
accessory (63:23)	(129:8)	amount (80:24)(115:15)
accident (145:10)	advertised (90:2)	analysis (9:5)(11:14)(16:3)(56:24)
according (116:14)(176:14)	advertisement (90:9)	(58:11)(77:20)
account (23:16)(26:8)(45:8)(160:2)	advertisements (195:21)(196:12)	analyst (9:17)(9:19)(10:14)(10:15)
(161:4)(161:12)(161:14)(166:16)	advertising (46:11)(89:15)(89:20)	(10:22)(11:4)(11:23)(108:21)(161:11)
accountant (8:23)(8:25)(9:3)(11:16)	(90:12)(158:5)(158:11)(193:13)(194:16)	analysts (106:6)(137:1)(154:4)
(189:10)	(195:5)(195:9)(195:18)(196:19)	analyze (56:16)
accounted (21:22)(91:20)(95:11)	advice (178:8)	analyzing (56:15)(116:4)
accounting (8:2)(11:10)(11:12)(14:11)	affect (152:5)	and/or (63:24)(151:2)(180:16)
(21:10)(22:7)(30:24)(33:1)(37:10)(43:18)	affected (128:2)(196:22)	announced (140:4)
(91:13)(91:15)	affecting (123:11)	annual (38:13)(39:11)(72:9)(73:11)
accounts (44:8)(45:3)(45:5)(45:7)	affiliated (186:11)	(75:12)(75:21)(77:4)(79:23)(87:16)
(45:15)(45:19)(45:22)(91:21)(161:15)	affirm (73:15)	(104:12)(104:15)(136:8)(174:11)
accrual (23:24)	after (4:21)(7:23)(8:3)(8:5)(8:17)(8:18)	annually (136:3)(174:13)
accrue (82:14)	(11:16)(52:9)(60:7)(77:25)(79:17)(79:18)	another (10:7)(24:17)(33:19)(35:21)
accrued (31:21)(31:22)(32:11)(62:18)	(98:15)(107:6)(122:13)(138:10)(138:12)	(36:11)(48:14)(55:16)(68:14)(101:23)
accuracy (52:13)	(143:10)(154:13)(176:11)(185:25)	(129:14)(158:23)(158:25)(173:21)
accurate (52:11)(109:15)(109:16)	against (47:3)(63:7)(116:12)(133:11)	(182:23)(190:15)
(112:8)	(148:16)(150:12)(150:17)(150:20)	answer (16:19)(27:17)(34:2)(38:6)
accurately (75:21)	(157:24)(158:1)(158:2)(169:7)(169:11)	(42:8)(42:25)(52:16)(52:22)(56:3)(68:20)
accused (6:16)(15:15)	(174:22)(187:3)(187:4)	(84:19)(84:22)(85:6)(88:7)(92:21)(92:22)
acquired (13:10)(13:12)(17:4)(60:7)	age (4:2)	(101:8)(112:6)(114:13)(146:14)(148:8)
(135:6)	agencies (44:12)	(150:2)(158:16)(168:14)(177:19)(177:25)
acquisition (13:14)(18:16)(18:24)	agency (171:13)	(178:17)(178:19)(179:4)(179:15)(179:17)
(128:7)(142:9)(142:21)(154:13)	aggregated (70:3)	(186:15)(186:16)
acronym (29:18)(32:22)(152:14)	aggressive (157:24)(158:1)(158:2)	answered (58:22)(59:19)(88:5)
across (36:13)(36:19)(36:20)(37:15)	aggressively (145:23)(146:21)(146:22)	(163:18)(163:19)
(39:8)(40:15)(47:7)(54:12)(152:13)	agree (22:14)	answering (147:16)
(152:18)(158:14)(174:6)(188:8)(190:21)	agreed (78:14)	anticipate (50:16)
action (1:6)(157:25)(158:1)(158:2)	agreement (23:22)	anticipated (53:8)
(186:14)(198:16)	ahead (53:21)(189:24)	anymore (154:21)
actions (137:20)(150:11)(150:14)	aid (9:12)(68:12)	anytime (72:16)(174:25)
(172:8)	air (9:12)	anywhere (31:15)(73:23)(96:11)(189:9)
active (63:6)(148:16)	aisle (195:12)(195:15)	apart (23:21)(127:17)(163:11)
actively (146:23)(146:25)	aisles (103:2)(103:6)(103:7)	appear (38:17)(63:10)(74:15)(78:18)
activity (160:7)	alan (1:14)(4:1)(4:20)(5:9)(198:20)	(79:9)(97:4)(147:6)
actual (30:11)(30:13)(30:15)(71:20)	a-l-a-n (5:11)	appearances (198:18)
(91:12)(105:22)(105:23)(125:17)(136:7)	aligned (119:11)	appearing (4:14)(4:17)
(170:3)	alkaline (68:11)(74:2)(137:11)(137:12)	appears (27:4)(60:25)(79:23)(86:23)
actuality (110:6)	allocate (196:25)	(93:1)(95:7)(104:25)(109:16)(112:7)
actually (6:19)(9:7)(14:3)(17:13)	allocated (84:11)	(121:22)(144:17)(170:17)(171:5)(190:5)
(31:13)(31:17)(33:17)(36:13)(39:4)(40:24)	allocation (85:20)(85:22)(89:17)(89:19)	(191:19)
(41:21)(42:14)(45:24)(64:17)(69:2)	allow (145:25)	appendix (152:21)
(105:13)(107:3)(112:10)(116:18)(116:23)	allowance (31:20)	application (171:11)(171:20)
(141:1)(155:13)(163:2)(170:8)(175:15)	allowances (21:15)(46:11)	apply (159:13)
(189:21)(197:9)	allowed (165:4)	applying (22:25)
	almost (33:6)(47:13)(138:12)	appreciate (55:9)(82:6)(105:10)
	along (8:13)(18:1)(65:22)(71:10)(91:6)	approach (182:16)(183:4)

appropriate

bottom

appropriate (24:8)(56:5)(80:24)(81:17)
(107:5)(107:24)(107:25)(108:4)(158:18)
(158:20)(159:11)
appropriately (106:9)(114:7)(119:11)
(127:5)
approved (198:12)
approximate (112:22)(114:17)(114:22)
(114:25)
approximately (6:21)(8:8)(11:5)(17:2)
(37:23)(61:23)(100:12)(112:14)(112:15)
april (12:11)(20:25)(55:18)(55:19)(96:4)
archive (94:11)
archived (81:24)
area (9:18)(77:20)(79:3)(90:22)(91:1)
(108:4)(108:9)(108:10)(146:11)(187:20)
(187:23)(189:20)
areas (98:21)(100:14)(100:16)(155:23)
aren't (46:14)
argaez (4:12)
arise (173:7)
arming (184:22)
around (100:14)(175:23)
arrangement (21:24)(23:6)
arrangements (21:18)(47:2)
arrive (103:13)(127:13)
arrives (127:12)
article (28:13)
aside (63:23)(65:2)(138:2)
asking (47:15)(54:21)(73:8)(127:17)
(146:14)(150:18)(178:23)(191:22)(192:4)
assemble (80:23)(82:1)(162:21)
(162:22)
assign (28:5)(82:9)
assimilate (119:2)
associated (69:7)(71:11)(80:25)(83:6)
(84:15)(96:18)(121:19)(170:2)(170:25)
association (96:21)(96:22)
assume (12:12)(40:18)(47:21)(71:16)
(95:24)
assumes (68:18)
assuming (69:22)(186:18)
attached (28:23)(59:18)(81:21)
attend (137:2)
attention (27:1)(37:12)(46:1)(55:11)
(62:16)
attorney (148:7)(179:3)(179:7)
attorney-client (178:8)
attorneys (4:9)(4:13)(4:16)(7:10)
(198:6)
attributed (53:2)
attributes (2:16)(105:1)
audience (136:23)(137:23)
audiences (137:21)
august (59:16)(73:21)
authorization (24:9)
automate (107:1)
automated (107:7)(168:25)
available (18:18)(39:16)(81:1)(104:5)
(114:19)(184:12)(185:5)(185:22)(186:7)
(186:8)(193:1)(195:13)(195:16)
avenue (195:19)
average (112:2)(118:3)(118:7)(118:8)
(118:14)(120:17)(120:18)(121:22)(122:6)
(123:5)(123:24)(123:25)

avila (170:8)(170:9)(170:10)
avili (86:19)
aware (5:12)(6:3)(16:21)(16:23)(17:6)
(17:11)(18:12)(23:4)(23:6)(25:8)(35:9)
(49:6)(52:9)(52:17)(53:5)(53:20)(53:23)
(57:14)(57:16)(58:9)(58:20)(59:7)(60:1)
(63:18)(64:5)(67:2)(67:12)(68:4)(68:16)
(69:22)(70:1)(70:9)(70:12)(74:1)(74:10)
(74:21)(74:25)(76:16)(77:7)(80:1)(80:11)
(85:11)(85:16)(89:24)(107:10)(131:15)
(142:7)(148:24)(149:15)(150:13)(150:22)
(151:3)(151:5)(160:24)(160:25)(161:3)
(161:13)(165:18)(167:17)(168:15)
(175:24)(197:4)
away (26:21)(41:17)

B

back (7:24)(9:17)(11:4)(12:8)(13:6)
(14:17)(24:3)(24:10)(28:23)(31:23)(32:4)
(32:6)(34:20)(35:21)(40:9)(40:25)(46:1)
(52:10)(56:23)(64:16)(64:18)(75:7)(78:2)
(79:6)(79:10)(86:20)(92:11)(94:10)
(100:22)(102:9)(107:1)(109:25)(110:12)
(111:2)(114:5)(114:18)(116:3)(122:5)
(122:10)(125:7)(131:24)(140:21)(141:15)
(142:12)(143:13)(143:18)(145:16)
(145:17)(159:12)(160:3)(165:9)(165:10)
(166:20)(170:7)(182:9)(188:14)(192:21)
background (7:20)
backup (152:25)(153:1)
bad (21:15)(187:5)
ball (14:20)
balls (98:9)(98:10)
bar (39:25)
bare (173:22)
base (95:15)(148:2)(148:10)(162:10)
(162:18)(163:11)(164:11)(164:12)
(164:13)(165:4)(170:4)(174:3)
based (21:12)(24:15)(50:25)(56:24)
(61:9)(66:19)(69:22)(82:5)(92:4)(109:18)
(110:10)(141:19)(147:6)
basic (156:10)
basically (10:5)(17:4)(19:23)(21:15)
(31:8)(31:9)(32:14)(63:7)(68:13)(83:16)
(107:6)(108:14)(120:9)(120:17)(125:15)
(153:18)(162:17)(174:11)(183:11)(185:17)
basin (163:8)(163:9)(163:17)(163:22)
(163:23)(164:20)(164:21)
basis (2:19)(2:20)(25:3)(25:4)(26:24)
(34:15)(37:24)(39:11)(42:17)(74:22)
(74:23)(74:25)(75:1)(75:3)(76:17)(79:23)
(81:8)(84:11)(84:23)(87:13)(87:14)(87:15)
(87:16)(88:16)(88:21)(101:10)(140:2)
(148:6)(148:8)(148:9)(158:15)(161:2)
(165:16)(166:12)(174:11)(177:25)
(178:13)(178:22)(180:15)(180:18)(194:7)
bates (35:14)(54:9)(64:11)(86:21)
batteries (9:12)(68:12)(68:13)(184:5)
(188:19)
battery (61:4)(61:5)(120:23)(128:19)
(128:20)(151:1)(180:2)
bear (73:2)(93:7)(115:21)(129:1)(129:3)
bearing (74:18)(93:9)
became (12:17)(15:10)(17:6)(43:7)

(43:12)
becker (8:6)
becomes (97:5)(178:15)
beepers (28:15)
begin (79:6)
begins (20:18)
behalf (4:2)(4:14)(4:17)(6:10)
behavior (173:18)(174:4)
behind (53:22)(122:4)(122:8)(148:6)
(156:12)(158:5)(167:5)(185:24)(194:8)
believe (19:13)(36:1)(36:4)(45:21)
(59:11)(59:19)(61:23)(63:13)(72:6)(76:23)
(82:17)(82:21)(84:6)(85:7)(102:6)(103:22)
(103:24)(106:21)(124:18)(126:20)
(126:22)(129:13)(132:19)(134:18)
(134:21)(139:2)(143:2)(149:17)(160:11)
(165:18)(168:6)(168:13)(171:23)(174:13)
(177:14)(179:19)(185:15)(187:10)
(187:22)(195:10)
believed (140:8)(140:9)
below (125:19)(140:8)(170:24)
benchmark (3:3)(169:11)(180:11)
(180:12)(181:20)(186:24)(187:2)
benchmarks (180:14)(180:15)(180:19)
(181:17)(181:18)(181:25)
benefit (15:12)(167:14)(168:19)
(171:17)(172:1)(175:16)
benefits (61:15)(71:14)(114:1)(114:19)
(115:20)(122:13)(122:15)(123:22)(127:6)
(127:23)(128:13)(129:6)(129:20)(145:1)
(145:25)(162:2)(167:9)(174:20)
besides (18:1)(58:4)(68:9)(100:2)
best (51:2)(51:6)(65:23)(66:1)(66:8)
(67:3)(67:4)(67:5)(67:9)(71:10)(79:11)
(86:5)(86:17)(101:22)(101:23)(109:5)
(112:23)(118:5)(122:14)(143:21)(144:2)
(144:4)(144:5)(162:6)(184:16)
better (65:23)(66:1)(67:4)(71:10)
(122:14)(143:20)(144:2)(145:6)(145:20)
(175:16)
beyond (89:17)(165:24)
big (5:18)(9:2)
bigger (153:24)(153:25)
biggest (14:15)(14:17)
bilingual (49:2)
bill (109:25)(111:2)
binder (155:12)
binders (155:4)(155:7)(155:10)
(155:13)(156:2)
bit (7:21)(23:1)(27:22)(64:11)
black (114:11)
blade (174:5)
blank (38:17)(170:4)
blanking (133:16)
board (17:3)(33:1)(86:5)(191:5)(191:7)
bonus (28:22)(28:24)(29:2)(47:13)
(47:24)
book (23:23)
boss (101:23)(135:1)
boston (4:14)
bother (93:24)
bottle (76:14)(76:15)(162:19)(163:10)
(163:13)(163:15)(177:4)
bottom (29:13)(29:15)(37:5)(50:4)

bought

(55:17)(64:21)(70:23)(170:18)
bought (24:25)(42:4)(94:10)(142:12)
box (76:13)(76:15)(80:22)(82:23)
 (103:15)
brand (16:6)(56:20)(58:14)(65:10)
 (90:25)(91:3)(125:5)(131:21)(133:15)
 (134:22)(137:11)(137:12)(147:5)(194:24)
 (194:25)(195:1)(195:6)(195:20)(196:13)
brands (39:3)(137:1)(137:4)(137:9)
 (155:14)(155:15)
braun (1:4)(4:3)(118:2)(120:10)
 (120:13)(131:2)(142:2)(148:2)(148:10)
 (148:16)(151:9)(152:6)(160:23)(167:15)
 (167:18)(170:5)(170:6)(171:1)(171:2)
 (171:14)(171:21)(172:3)(181:22)(181:24)
 (183:10)(191:25)(192:23)
braun's (130:12)(134:9)(134:14)
 (134:16)(169:7)(169:19)(169:21)(171:4)
 (171:16)(172:23)(181:16)(191:6)
break (34:21)(35:2)(77:24)(92:6)
 (104:20)(166:17)(197:6)
breakdown (92:14)
breaks (88:21)
bring (14:6)(32:4)(103:1)(120:18)
 (133:4)(133:13)
brings (120:14)
broad (174:3)
broadened (13:16)
broker (44:3)(44:5)(44:6)(84:5)(88:8)
 (88:10)(88:13)
brought (7:14)(14:3)(150:14)(150:16)
 (161:16)(161:17)(171:12)(187:14)
bruce (50:5)(50:6)
brush (136:7)
brushed (136:5)
buckets (38:13)
bucks (121:1)(126:18)
budget (9:4)(11:14)(86:9)(86:12)
 (86:15)(89:9)(89:11)(89:13)(89:15)(89:20)
 (90:13)(196:22)
budgeting (85:20)(85:22)
build (93:17)(151:20)(195:5)(195:19)
 (195:20)
building (55:9)(156:14)(194:25)
 (196:12)
built (94:21)
bulk (102:16)
bump (41:11)(102:24)
bunch (133:17)(191:5)
button (109:11)
buy (18:6)(19:21)(159:9)(163:17)
 (163:20)(163:21)(163:23)(181:12)(191:3)
 (193:25)
buyer (160:17)(160:18)(185:22)
buying (122:6)
buys (31:24)(109:10)

C

cabinet (136:16)
calculate (108:1)
calculation (79:24)
calendar (31:2)(33:6)(33:7)(42:13)
call (20:3)(31:12)(32:19)(44:14)(87:11)
called (4:21)(17:25)(19:17)(57:8)

cleaner/charger

(57:14)(66:10)(70:24)(105:3)(105:13)
 (117:17)(120:21)(147:19)(152:21)(172:7)
 (182:15)(187:7)
calling (45:5)(45:6)(45:8)
calls (158:13)
came (12:8)(15:18)(17:3)(40:14)(53:1)
 (69:13)(73:4)(90:12)(94:16)(106:24)
 (123:2)(142:25)(148:9)(165:7)(170:10)
canada (11:21)(12:6)(48:11)(48:12)
 (48:13)(48:20)(48:21)(48:23)
canadian (29:19)(60:15)(60:19)
cannot (33:18)(73:14)(76:18)
cap (103:3)(103:5)(103:11)
capacity (15:10)
cardboard (41:11)(76:13)(76:15)
 (102:13)(102:23)
cards (148:13)
care (68:11)(98:1)
carries (31:14)
carry (44:12)(90:25)(115:24)(116:2)
 (154:23)
cart (102:24)
carton (87:5)
cartridge (176:4)(176:13)(176:15)
 (176:17)(176:24)(177:1)(177:7)(177:10)
carts (41:12)
cascade (167:9)
case (15:15)(20:9)(21:21)(21:23)(22:2)
 (22:25)(29:22)(36:20)(62:12)(63:17)
 (102:15)(117:9)(144:2)(149:4)
cases (46:11)(105:11)
cash (31:6)(31:18)(31:19)
categories (45:12)(65:25)(66:22)(67:5)
 (67:6)(71:13)(83:10)(98:5)(98:12)(99:19)
 (101:18)(118:4)(146:1)(146:3)(146:4)
 (146:5)
categorizing (71:12)
category (67:3)(67:9)(83:12)(84:11)
 (85:8)(118:2)(118:6)(118:9)(118:13)
 (118:17)(118:21)(118:22)(119:4)(119:7)
 (119:20)(119:22)(120:1)(120:13)(120:15)
 (122:14)(130:1)(132:15)(151:1)(155:18)
 (158:5)(158:23)(158:25)(159:25)(160:17)
 (160:19)(173:17)(174:7)(174:13)(184:1)
 (184:4)(184:6)(184:7)(184:13)(184:14)
 (184:17)(184:18)(184:21)(193:1)(194:14)
cause (4:3)(4:22)(119:24)(122:11)
 (195:4)(198:22)
causes (53:6)
caution (148:5)
cdn (29:18)(48:21)(48:23)(48:24)
celebration (153:25)
cells (9:13)
center (57:9)(57:12)(58:8)(63:20)
 (64:4)(70:8)(70:11)(70:25)(72:10)(74:9)
 (74:14)(75:24)(80:3)(81:13)(89:9)(89:22)
 (89:25)(90:16)(90:22)(91:4)(93:25)(94:5)
 (94:7)(94:19)(94:20)(94:25)(97:13)(97:15)
 (99:6)(100:1)(102:2)(102:3)(113:5)(113:9)
 (114:14)(115:13)(122:19)(123:2)(159:13)
 (160:10)(162:9)(181:16)
centers (97:14)(99:9)(99:11)(99:13)
 (100:3)(101:18)(101:20)
centralized (26:13)

cents (41:20)
certain (20:13)(41:13)(44:8)(45:3)
 (65:23)(82:19)(98:3)(99:2)(101:19)
 (110:18)(126:10)(132:12)(134:18)
 (134:21)(136:5)(153:21)(155:23)(167:11)
 (175:8)
certainly (25:24)(33:6)(33:8)(52:25)
 (72:5)(81:3)(84:12)(87:5)(120:5)(130:3)
 (130:8)(135:17)(138:11)(138:13)(144:6)
 (146:19)(147:16)(148:17)(149:24)
 (154:13)(155:24)(161:2)(161:9)(173:16)
 (185:5)(186:10)(188:11)
certify (198:4)
chain (13:5)(29:20)(62:8)
challenges (14:15)(14:17)
change (13:13)(21:18)(33:3)(113:11)
 (113:13)(120:3)(123:25)(126:23)(126:24)
 (127:3)(139:22)(163:4)(188:17)
changed (10:16)(10:17)(32:17)(43:17)
 (65:13)(65:15)(126:25)
changes (112:24)(113:4)(113:6)
changing (139:24)(139:25)(140:1)
 (141:16)
channel (29:10)(161:17)
channels (29:13)(29:14)(107:23)
 (161:17)
characteristics (39:2)
characters (29:21)(96:3)(96:5)
charge (58:16)(109:17)(130:12)
 (134:16)(134:24)
charged (16:5)(106:1)(111:10)(111:12)
 (169:2)
charges (82:4)(82:5)
charging (131:3)
chart (82:12)(120:17)(144:8)(190:11)
 (190:12)(190:13)(190:14)
charter (100:19)
check (94:20)(159:12)
checkpoint (28:11)(59:23)
chicago (4:16)
choice (171:6)(184:13)
choices (120:2)(184:20)
choose (87:1)
chose (63:4)(144:8)
chosen (171:10)(171:15)(195:19)
circumstances (105:12)(112:4)
 (179:20)(179:22)(179:24)
cite (53:12)
city (198:7)
civil (1:6)
claim (180:4)
claiming (171:17)
claims (151:2)(170:2)(170:25)(171:6)
 (171:9)(171:10)(182:6)
clarification (94:5)
clarify (179:11)
clark (4:8)(198:6)
classification (39:1)(69:11)(82:11)
 (82:12)
clean (130:12)(134:16)(167:23)
cleaned (165:2)(169:2)
cleaner (67:12)(70:2)(166:22)(167:14)
 (171:8)
cleaner/charger (3:1)

cleaners

cleaners (167:12)
cleaning (2:5)(17:21)(18:10)(26:22)
 (28:4)(33:11)(57:7)(57:8)(57:12)(57:21)
 (58:8)(58:19)(58:24)(63:19)(63:24)(64:4)
 (68:17)(68:22)(70:8)(70:11)(70:24)(71:1)
 (72:9)(74:9)(74:14)(74:17)(74:18)(75:5)
 (75:23)(75:24)(76:9)(76:22)(80:3)(80:7)
 (80:21)(80:22)(81:13)(83:4)(86:24)(89:9)
 (89:12)(89:22)(89:25)(90:3)(90:10)(90:16)
 (90:21)(91:2)(91:4)(93:25)(94:5)(94:7)
 (94:9)(94:19)(94:20)(94:25)(95:15)(97:23)
 (102:1)(102:3)(113:5)(113:7)(113:9)
 (114:14)(114:25)(115:13)(115:15)
 (115:18)(115:23)(119:6)(121:19)(122:19)
 (123:2)(123:12)(128:17)(131:3)(132:9)
 (139:8)(140:5)(141:18)(148:2)(148:10)
 (151:10)(152:6)(159:13)(160:10)(162:9)
 (162:10)(162:18)(162:19)(162:20)
 (162:24)(162:25)(163:5)(163:7)(163:8)
 (163:10)(163:11)(163:14)(163:17)
 (163:22)(163:23)(164:10)(164:11)
 (164:12)(164:13)(164:20)(164:21)
 (164:24)(165:1)(165:4)(165:13)(165:21)
 (165:25)(166:12)(166:24)(167:6)(167:7)
 (168:1)(168:4)(168:23)(169:19)(169:21)
 (170:3)(170:4)(171:7)(172:1)(172:17)
 (172:20)(173:5)(176:4)(176:5)(176:22)
 (176:25)(177:1)(177:7)(177:10)(181:15)
 (182:11)(183:12)(183:13)(183:16)
 (191:15)(196:18)
cleaning/charging (169:1)
clear (88:23)
clearly (14:18)(67:14)
close (72:7)(105:17)(187:19)
closed (13:22)
closeness (32:2)(128:22)
closeout (29:14)
closer (16:17)
clothes (98:7)(98:8)(98:10)(98:11)
 (188:23)
code (37:10)
coinciding (190:8)
collaborative (51:14)(147:23)(154:6)
colleague (5:7)
collect (124:10)
collection (115:19)
collects (32:5)
college (7:22)(8:17)(8:18)
colors (87:5)(170:23)
column (30:7)(31:4)(36:11)(38:14)
 (38:18)(39:8)(40:19)(41:1)(41:24)(42:14)
 (42:23)(43:3)(43:21)(46:2)(70:23)(88:18)
 (96:15)(97:12)(98:15)(109:13)(191:4)
columns (38:17)(40:16)
combat (160:7)(195:11)
combination (42:4)(45:6)(45:16)
 (50:23)(136:22)(187:12)
combined (16:16)
come (18:19)(19:2)(19:8)(25:15)
 (31:22)(40:25)(66:14)(66:22)(85:20)
 (101:15)(106:22)(107:4)(107:9)(108:17)
 (108:18)(134:16)(138:18)(157:21)
 (164:20)(170:6)(170:9)(171:3)(184:3)
 (189:6)(189:7)(189:9)(196:24)

consumers

comes (24:3)(40:9)(42:3)(88:23)
 (107:11)(107:12)(109:8)(109:11)(111:2)
 (148:6)(163:10)
comfort (128:22)
comfortable (147:12)
coming (140:4)(153:19)(162:3)(185:24)
command (67:8)
commencing (4:10)(198:8)
comment (79:1)
comments (170:24)
commercial (90:11)
commission (44:17)
commissioned (174:9)(192:18)
commissions (44:3)(44:5)(44:6)(84:5)
 (88:8)(88:10)(88:14)
committed (38:12)
committee (188:3)
common (72:4)(99:6)(158:9)
commonly (185:15)
communicate (153:10)(156:9)
communicated (150:23)(159:9)
communicates (75:5)
communication (26:3)(178:4)(178:8)
 (178:10)
communications (147:2)(148:7)
companies (32:18)(32:20)(120:8)
 (138:12)(155:15)
company (14:2)(17:4)(18:17)(32:20)
 (42:5)(42:19)(43:10)(45:10)(60:7)(94:10)
 (100:3)(121:4)(125:16)(128:6)(134:25)
 (137:9)(138:1)(142:13)(148:23)(154:15)
 (167:2)(174:25)(177:15)
company's (17:11)(25:20)(36:16)
compare (116:18)(116:21)(169:18)
 (195:23)
compared (169:20)
comparing (54:1)
comparison (172:22)(182:4)(182:7)
 (195:25)(196:3)
comparisons (183:3)
compatible (164:21)
compete (158:22)(158:24)(160:23)
competent (198:11)
competition (116:15)
competitive (120:4)(131:2)(150:20)
 (160:7)(162:1)(174:2)(195:11)
competitor (116:6)(116:9)(120:6)
 (120:14)(130:5)(130:9)(130:10)(130:24)
 (134:12)(150:17)(159:20)(159:22)
 (159:24)(161:5)(173:13)(173:20)(173:22)
 (174:8)(194:17)(195:24)(195:25)(196:1)
 (196:2)
competitors (118:9)(118:15)(118:16)
 (120:7)(121:4)(124:15)(130:6)(130:7)
 (150:25)(151:1)(181:23)(196:23)(196:24)
competitor's (127:9)(174:15)(174:17)
 (183:23)(195:4)
competitors' (173:24)(182:7)
compile (124:8)(124:14)(124:15)
complete (6:17)(14:7)(184:6)(184:7)
 (184:20)
completed (8:12)(14:8)(139:2)
complication (171:17)
complications (166:4)(171:15)

component (160:20)
components (80:21)(83:17)(128:20)
compound (73:7)
computer (28:5)(62:9)(106:14)
computer-aided (198:13)
computers (29:24)
con (43:22)
concentrated (71:4)(71:6)
concept (3:6)(119:12)(119:13)(131:10)
 (167:25)(168:3)(168:16)(168:19)(168:22)
 (168:24)(169:3)(169:4)(171:25)(180:12)
 (181:18)(181:19)(183:13)(183:14)
 (183:17)(191:5)(191:7)(192:7)(192:9)
 (192:11)(192:13)(192:14)(192:16)
 (192:17)(192:20)(192:22)(193:8)(193:9)
concepts (3:3)(180:11)(180:13)
 (181:20)(191:21)(192:25)(194:13)(194:15)
concern (165:19)
concerned (99:25)(100:21)(101:17)
 (180:4)
concerns (175:22)
conclude (39:20)(123:13)(123:16)
conclusions (57:3)
conditioner (28:25)
conditioning (171:18)(172:1)
conducting (191:17)
confident (75:20)
confidential (22:23)(23:2)
configuration (102:16)
configured (107:19)
confused (146:14)(146:15)(162:12)
 (166:9)
congratulations (8:15)
conscious (145:22)
consequently (32:21)(53:8)(67:8)
 (82:14)(118:6)(152:23)(155:16)(165:2)
consider (74:13)(75:12)(88:3)(89:2)
considerably (100:23)
consideration (171:21)(171:24)
considered (41:5)(47:12)(57:24)
 (61:17)(61:19)(66:6)(66:8)(66:17)(77:11)
 (77:15)(129:23)(130:2)(130:6)(130:9)
 (130:10)(130:23)(132:11)(134:9)(134:13)
 (140:23)(141:22)(143:2)(164:18)(165:16)
 (167:18)(173:14)(186:24)(186:25)
considering (139:24)(139:25)(140:1)
consistent (71:13)(76:6)(79:7)(115:2)
 (115:4)(115:6)(115:7)(115:9)
constant (52:12)
consumer (24:19)(24:20)(24:22)
 (24:24)(25:6)(25:9)(29:6)(30:1)(31:8)
 (31:24)(37:6)(37:20)(41:13)(46:15)(53:7)
 (53:14)(61:18)(67:6)(86:5)(97:9)(104:6)
 (115:24)(116:1)(119:17)(120:2)(120:15)
 (122:15)(124:11)(131:8)(158:4)(159:3)
 (159:18)(160:3)(162:21)(163:12)(168:20)
 (171:17)(173:10)(173:16)(173:18)
 (173:24)(174:4)(175:16)(182:8)(184:20)
 (187:14)(191:1)(191:2)(193:10)(193:22)
 (194:6)(194:15)(195:17)
consumer and (46:23)
consumers (19:20)(24:25)(115:20)
 (118:19)(122:5)(122:13)(152:1)(159:9)
 (160:20)(168:18)(184:7)(184:13)(192:16)

consumer's

(192:24)(194:4)
consumer's (61:14)(181:11)
contact (44:14)(44:18)(44:19)
contacts (108:4)
contain (106:15)
container (176:5)
contains (36:22)(114:1)
contemplated (176:13)
contemplating (141:18)
contingencies (151:10)(152:6)
continue (113:16)(145:24)(181:16)
 (193:16)
continuing (167:8)
contractor (80:23)
contractors (81:25)
contrasted (182:24)
contribution (37:7)(40:25)(41:3)
 (43:22)(43:24)(43:25)(46:19)(49:16)
 (49:19)(49:21)(77:13)(88:19)(88:24)
 (88:25)(89:2)(114:24)
controller (9:10)(9:18)(9:20)(11:1)
 (11:21)(12:18)(12:23)(13:2)(13:7)(13:17)
 (16:5)(94:24)
convenience (128:22)
convenient (168:1)
converted (42:15)
conveyed (111:24)(185:4)
conveys (144:17)
co-op (46:11)
coordinates (144:4)
copies (5:19)(7:13)(7:15)
copy (5:24)(154:22)(155:4)(175:4)
 (175:13)(175:21)(186:7)
cord (162:18)
corded (66:23)
cordless (66:23)(128:15)
core (30:6)(47:11)(47:12)(102:19)
corner (50:5)(55:17)(95:24)
corporate (186:2)
corporation (1:7)(4:4)(6:10)
correct (7:12)(12:4)(12:9)(13:19)(18:5)
 (20:19)(20:22)(21:4)(27:23)(27:24)(28:2)
 (30:10)(33:14)(35:5)(37:18)(37:22)(38:16)
 (38:18)(38:23)(39:9)(39:10)(39:13)(39:15)
 (40:1)(42:19)(43:4)(43:5)(43:8)(43:10)
 (43:11)(43:13)(43:19)(43:23)(47:8)(47:9)
 (47:11)(47:19)(48:7)(49:18)(55:24)(57:5)
 (57:23)(59:14)(59:21)(61:2)(63:9)(63:13)
 (66:7)(66:9)(66:15)(67:15)(69:25)(72:23)
 (72:24)(73:20)(75:22)(79:20)(79:21)
 (79:24)(79:25)(83:3)(83:14)(85:21)(85:24)
 (85:25)(86:11)(87:12)(87:23)(88:12)
 (89:16)(92:16)(92:18)(96:17)(97:24)
 (103:21)(108:5)(108:7)(115:10)(118:18)
 (122:22)(122:25)(123:3)(123:4)(124:7)
 (125:22)(125:24)(125:25)(126:1)(133:8)
 (141:5)(164:16)(164:17)(166:14)(170:14)
 (170:15)(170:20)(172:20)(172:23)(191:9)
 (191:12)(191:13)(191:24)(192:1)(194:12)
correctly (110:10)
cost (8:23)(8:24)(11:9)(11:11)(11:13)
 (11:16)(16:3)(36:18)(37:3)(37:6)(40:20)
 (40:21)(40:22)(41:4)(41:5)(41:7)(41:8)
 (41:9)(41:15)(41:21)(41:23)(41:25)(46:17)

defendant

(114:24)(149:23)(151:6)
customers (10:2)(10:4)(10:7)(10:19)
 (10:21)(18:15)(18:22)(21:12)(21:18)
 (22:12)(22:17)(26:20)(31:16)(31:17)
 (37:20)(39:22)(40:2)(44:14)(45:13)(45:23)
 (46:10)(47:1)(50:17)(51:10)(51:11)(74:11)
 (74:12)(74:14)(74:15)(74:16)(83:21)
 (83:24)(83:25)(91:23)(100:21)(105:16)
 (105:24)(106:1)(106:8)(106:19)(109:17)
 (161:16)
customer's (29:11)(97:4)(107:22)
 (108:2)
customs (82:11)
cut (40:19)(48:14)(67:22)(111:19)
cutoff (30:24)
cutoffs (30:21)
cuts (36:18)
cutter (104:9)
cutters (104:4)
cycle (43:18)

D

daily (68:4)
dalila (4:12)(5:7)
dane (198:2)(198:7)
data (27:12)(27:17)(36:19)(39:5)
 (48:14)(57:4)(67:22)(72:16)(73:10)(73:13)
 (96:23)(106:14)(108:6)(108:11)(108:12)
 (108:14)(108:15)(108:17)(108:24)
 (111:19)(123:7)(124:4)(124:5)(124:10)
 (124:11)(124:13)(124:15)(124:17)
 (124:19)(124:21)(125:2)(140:5)
date (1:19)(14:8)(17:1)(18:20)(33:5)
 (50:3)(55:18)(71:16)(72:14)(72:15)(72:18)
 (78:4)(78:20)(78:21)(96:4)(180:22)
 (191:10)(196:15)
dated (2:13)(2:14)(2:19)(2:20)(2:22)
 (3:4)(3:6)(55:6)(72:6)(153:8)(189:22)
 (191:9)(198:23)
dates (30:19)(78:7)(78:9)(142:12)
day (15:8)(110:11)(110:25)(111:4)
 (114:21)(114:25)(115:19)(138:17)
day-to-day (15:10)
deadline (49:15)(159:11)
deal (5:18)(13:22)(110:19)
deals (9:21)(22:6)(22:11)(22:14)
debts (21:15)
december (8:10)(20:21)(62:20)(159:5)
decide (93:15)
decided (56:4)(164:6)(164:18)
decides (194:10)
deciding (173:12)
decision (56:10)(56:19)(58:10)(58:13)
 (87:6)(93:20)(113:23)(113:24)(140:13)
 (140:14)(142:4)(143:11)(145:22)(147:4)
 (147:5)(164:3)(177:6)(177:9)
decisions (181:17)(193:16)(193:17)
 (194:16)
dedicated (16:19)(108:10)
deductions (9:22)
deemed (149:3)
defeats (164:11)(164:13)
defend (157:24)(158:2)
defendant (1:8)(4:4)(4:17)

defending

during

defending (157:25)
define (15:16)(65:14)(144:8)
defined (181:10)
defines (144:7)(184:11)
definitely (31:1)(93:23)
definition (32:20)(32:23)(100:24)
(123:24)(176:9)(176:15)
definitively (71:25)
deflate (120:12)
deflation (119:23)
deflationary (118:2)(118:17)(118:18)
(118:22)(119:4)(119:7)(119:20)(120:1)
degree (7:25)(8:1)(8:12)(88:14)
(100:20)
degrees (8:4)
deliver (167:10)(177:4)
delivery (107:4)
demand (131:11)
department (166:21)(166:23)(177:18)
(177:23)(178:14)(189:7)
depending (53:12)(63:1)(100:24)
(117:10)(161:14)
depends (19:4)(21:24)(65:14)(93:8)
(144:12)
deponent's (198:15)
deposition (1:13)(2:3)(4:1)(5:13)(6:13)
(23:19)(27:8)(56:2)(134:8)(198:5)(198:14)
(198:15)(198:19)
depositions (7:17)
depreciation (93:11)
described (15:15)(127:11)(137:13)
(154:2)(171:22)
describes (182:15)
describing (2:16)(102:24)(105:1)
description (29:24)(81:22)
design (3:1)(145:10)(165:19)(165:24)
(166:1)(166:13)(166:15)(175:23)(177:15)
(179:3)
designate (69:4)(102:11)
designated (6:3)(84:18)(117:18)
(134:5)(166:8)(177:13)
designed (137:21)(164:2)(165:12)
designing (175:5)
designs (177:14)
desirable (144:10)
desires (193:10)
detail (23:17)(27:14)(35:23)(71:5)
(71:7)(104:17)(117:10)(117:12)
detailed (15:12)
details (149:24)
determination (129:5)
determine (108:5)(116:1)
determined (129:3)
determining (33:22)
develop (85:23)(86:5)(87:8)(144:15)
(145:24)(160:18)(173:12)
developed (146:2)(189:1)
developing (138:3)(138:4)(173:19)
(188:6)
development (13:4)(84:14)(84:15)
(85:4)(85:9)(85:12)(85:14)(86:8)(86:9)
(86:15)(131:6)(131:14)(131:23)(133:2)
(133:3)(133:5)(166:22)(168:4)(168:12)
(169:6)(169:14)(169:18)(177:17)(177:22)

(179:25)(180:1)(181:15)(187:10)(188:2)
(189:4)(189:8)(189:13)(189:25)(190:1)
(193:11)(196:22)
diary (187:9)
dictate (110:22)(126:4)(126:14)
dictating (126:15)
differ (12:24)(30:15)(31:9)(45:2)
(137:15)(151:13)
difference (21:9)(30:2)(47:23)(61:6)
(61:12)(62:12)(64:20)(72:11)(102:25)
differences (14:10)(66:21)
different (2:16)(10:11)(11:24)(11:25)
(22:7)(28:21)(32:20)(39:2)(46:2)(52:23)
(52:24)(61:3)(62:14)(64:24)(66:22)(68:7)
(71:11)(73:10)(86:25)(100:13)(108:2)
(113:12)(116:23)(117:18)(118:25)
(121:23)(123:22)(137:21)(144:25)(145:1)
(146:1)(146:12)(146:15)(149:12)(153:14)
(153:16)(158:3)(170:23)(175:19)(180:16)
(187:9)(188:13)(190:2)(192:22)
differentiate (62:10)
differentiating (62:11)
differently (16:19)(64:12)(149:8)
(149:19)
difficult (14:25)(75:12)(118:21)
difficulties (166:13)
dig (111:15)
direct (37:11)(45:4)(45:21)(62:16)
(175:12)(175:22)(182:4)(182:6)(195:25)
(196:3)
directing (46:1)(55:11)
direction (60:8)(108:21)(135:25)
(137:17)(137:19)(149:1)(193:17)(193:18)
directive (146:23)
directly (15:22)(44:23)(56:13)(68:15)
(74:17)(135:8)(142:20)(152:2)(159:21)
(159:23)(171:7)(190:18)(195:23)
director (65:9)(134:22)
discarded (163:6)(163:15)
discernible (37:9)
discount (31:19)(119:17)
discounts (31:18)(105:19)(105:20)
(109:19)(110:5)
discrepancy (53:2)(72:13)
discussed (66:12)(84:6)(116:3)
(195:10)
discussing (6:18)(84:5)(191:21)
discussion (34:19)(83:15)(101:24)
(172:23)
discussions (6:14)(122:5)(127:22)
(128:3)(164:7)
disinterested (198:11)
display (103:16)(195:18)
displays (41:11)(42:1)(195:12)(195:15)
distinction (60:2)(61:9)(91:13)(156:5)
distributed (186:1)
distribution (19:20)(29:11)(83:18)
(83:19)(83:20)(83:22)(83:23)(84:8)(85:3)
(87:21)(88:3)(88:11)(88:13)(91:9)(91:11)
(91:16)(91:23)(92:2)
distributor (84:6)
district (1:1)(1:2)(4:5)(4:6)(198:17)
division (91:8)(134:24)(153:20)
document (2:6)(2:11)(2:12)(2:16)

(5:17)(5:19)(5:23)(5:24)(25:6)(25:8)
(25:12)(26:18)(27:2)(27:5)(27:9)(27:21)
(35:1)(35:6)(35:18)(47:18)(48:10)(49:13)
(49:24)(50:1)(54:15)(55:3)(55:8)(59:13)
(63:12)(64:9)(65:19)(69:21)(70:16)(70:17)
(72:6)(73:18)(74:1)(78:10)(78:22)(86:21)
(86:22)(86:23)(88:20)(89:6)(92:1)(92:6)
(92:13)(92:19)(92:25)(95:4)(95:5)(95:10)
(95:18)(95:19)(95:20)(98:17)(99:15)
(104:24)(104:25)(116:25)(117:1)(117:4)
(117:7)(117:23)(124:22)(130:17)(135:11)
(135:12)(140:24)(141:9)(147:11)(147:13)
(153:4)(153:5)(153:7)(153:9)(154:5)
(156:24)(156:25)(157:1)(157:2)(157:10)
(157:16)(157:18)(161:19)(161:20)(168:7)
(168:9)(169:24)(171:5)(172:6)(176:10)
(176:20)(176:21)(180:9)(180:22)(180:23)
(181:2)(182:13)(185:3)(189:19)(190:7)
(190:9)(190:15)(192:3)(192:20)
documentation (6:15)(159:11)
documented (77:3)
documents (6:18)(6:23)(7:3)(7:4)(7:6)
(7:14)(26:19)(35:19)(73:14)(74:8)(74:20)
(76:24)(80:1)(80:2)(80:5)(81:2)(81:5)
(81:6)(87:19)(88:12)(104:10)(111:24)
(116:24)(125:4)(141:2)(156:3)(157:4)
(184:25)(185:2)(186:21)
doesn't (61:11)(63:9)(98:11)(102:18)
(152:4)(184:15)(193:5)
doing (10:15)(50:21)(110:20)(174:13)
(183:2)(194:6)(194:17)
dollar (71:18)(72:1)(193:22)
dollars (24:13)(77:19)(112:1)
done (39:11)(42:17)(49:10)(50:2)
(52:9)(61:10)(75:1)(83:5)(83:7)(91:13)
(142:9)(145:6)(145:7)(145:20)(155:8)
(159:16)(159:19)(159:21)(159:23)
(160:16)(168:4)(194:7)(197:6)
down (15:7)(29:3)(29:15)(36:5)(36:15)
(36:17)(36:21)(37:15)(39:24)(86:7)
(101:19)(101:25)(103:2)(103:6)(103:21)
(109:7)(118:9)(118:10)(118:12)(118:19)
(119:3)(120:18)(132:9)(138:16)(138:22)
(149:9)
download (155:17)
doyle (6:16)(134:23)(134:24)(135:3)
(135:8)(135:17)(138:21)(142:16)(157:20)
(162:5)(170:20)(181:4)(186:16)
dramatically (193:24)
drive (19:7)(118:5)(120:5)(159:2)
(159:3)(188:25)
driven (118:2)(120:12)(133:5)
driver (79:4)
drivers (14:24)(128:24)(156:12)
driving (24:19)(118:13)(123:17)
(132:21)(133:2)(133:3)(173:18)(175:1)
(175:3)(175:6)(175:8)
drop (14:20)(24:13)
dropped (122:2)(122:3)(159:5)
dryers (184:6)(188:22)
dual (66:24)
due (105:11)
duly (4:22)
during (13:23)(13:24)(23:25)(30:13)

duties

(30:20)(33:6)(33:7)(42:1)(42:3)(59:11)
 (60:25)(121:23)(136:20)(142:18)(160:12)
duties (13:14)(13:16)
duty (80:25)(82:4)(82:5)(82:10)(82:13)
 (82:14)

E

earlier (41:18)(59:2)(84:4)(102:14)
 (103:23)(119:15)(122:5)(143:18)(143:20)
 (154:2)(162:7)(168:13)(170:13)(195:10)
early (72:20)(178:14)(180:5)(196:16)
earn (46:10)
easiest (26:23)
east (4:16)
edi (106:12)(106:22)(107:9)(107:11)
 (107:12)
education (15:2)(15:4)
educational (7:21)
effect (178:25)
effective (159:17)
effectively (178:9)
efficient (44:9)
effort (52:12)(135:13)(147:23)(154:6)
 (171:19)
efforts (13:25)
eiff (32:13)(32:16)(32:21)(32:24)
 (40:18)(46:16)(79:18)(79:22)
either (22:13)(23:21)(45:15)(52:18)
 (53:12)(53:15)(68:14)(73:25)(77:9)(156:2)
 (165:5)(171:6)(179:7)(189:14)(197:12)
electric (3:6)(28:25)(41:19)(174:5)
 (174:6)
electronic (28:13)(81:7)(106:14)
 (124:24)
elizabeth (1:23)(4:7)(198:3)
ellis (4:16)
else's (196:5)
e-mail (69:13)
e-mails (3:1)
emerging (32:25)
employed (60:5)
employee (44:18)
employees (44:11)(45:4)
empty (163:15)
end (2:15)(9:20)(14:2)(57:24)(66:5)
 (66:6)(73:5)(95:25)(96:2)(103:3)(103:5)
 (103:8)(103:11)(109:25)(110:7)(110:11)
 (110:25)(111:4)(112:5)(114:20)(115:19)
 (130:8)(152:22)(152:24)(180:6)(184:23)
 (190:8)(195:12)(195:15)
ended (31:3)
ends (30:18)(98:13)
engage (158:9)(160:9)
engineering (78:22)(85:18)(85:23)
 (175:23)(189:7)
engineers (86:3)(86:4)
enough (9:2)(61:13)(151:20)
ensure (6:17)(24:8)(106:8)(113:15)
 (173:22)
ensuring (79:4)
entail (15:2)
entails (182:21)
entered (167:12)
entering (120:8)

enters (127:4)
entire (63:24)(155:25)(169:4)
entirely (102:25)(119:21)
entitled (153:7)(172:14)(189:22)(192:9)
entry (62:17)(119:25)(141:19)(141:23)
 (167:6)
environment (27:17)
equals (32:12)
equity (194:24)(195:6)(195:20)(196:13)
erosion (118:23)(118:25)(119:2)
 (119:9)(119:14)(119:18)
error (63:8)
escapes (29:12)
essentially (13:14)(78:14)(162:8)
establish (9:4)
established (43:3)(113:1)
establishing (139:11)(139:17)(139:19)
estate (103:10)
estimate (82:6)(112:23)
estimated (47:5)(86:23)(93:21)
evaluate (117:13)
evaluated (133:9)(177:15)
evaluates (178:18)
evaluating (133:13)(134:10)(139:15)
 (139:19)(141:16)
evaluation (57:2)
everybody (103:2)
everyday (125:24)
everyone (91:3)
everything (111:4)(120:9)
evidence (68:19)
exact (17:1)(19:16)(33:5)(47:15)
 (62:11)(76:6)(82:9)(105:11)(112:13)
 (112:17)(129:24)(132:20)(136:14)(164:7)
 (176:21)(179:20)
exactly (17:10)(29:17)(31:3)(37:23)
 (40:13)(47:23)(73:13)(102:20)(126:7)
 (185:18)(188:24)
exam (8:5)
examination (5:2)(198:20)
examining (5:17)(59:13)(63:12)(64:9)
 (70:17)(95:19)(117:23)(130:17)(141:2)
 (153:5)(156:24)(169:24)(172:6)(176:10)
 (180:9)(182:13)(189:19)(192:3)
example (15:5)(19:9)(23:12)(26:9)
 (36:17)(36:20)(37:8)(37:11)(38:10)(41:12)
 (41:17)(41:18)(46:14)(48:21)(81:12)(98:7)
 (102:15)(106:10)(119:14)(119:22)
 (123:19)(131:13)(136:6)(137:7)(151:25)
 (152:16)(153:17)(153:20)(161:4)(162:23)
 (164:14)(169:18)(186:2)(189:6)(194:3)
examples (21:25)(29:1)(41:13)(45:25)
 (46:9)(46:12)(53:12)(53:20)(161:8)(161:9)
 (185:3)(185:16)
except (102:20)
exceptions (197:3)
excitement (158:4)(159:3)(159:18)
 (160:6)
exclude (88:10)
excluding (101:1)
exclusive (48:15)
exclusively (90:17)(90:18)(90:20)
 (159:14)(181:23)
execute (156:11)

fall

executive (8:11)(26:15)
exhibit (5:1)(5:15)(27:2)(37:12)(38:14)
 (46:1)(49:23)(54:8)(59:12)(62:5)(63:9)
 (63:11)(64:7)(64:22)(65:3)(66:12)(70:15)
 (72:11)(72:15)(73:11)(73:17)(75:10)
 (75:14)(78:5)(79:10)(79:22)(83:9)(86:20)
 (92:24)(95:3)(95:17)(104:23)(116:17)
 (116:19)(117:21)(125:8)(130:15)(131:24)
 (132:6)(137:13)(141:4)(141:7)(141:21)
 (143:13)(143:19)(153:3)(156:22)(157:7)
 (157:8)(169:22)(170:24)(172:4)(172:8)
 (172:22)(172:24)(176:8)(180:7)(180:10)
 (182:9)(182:10)(183:5)(185:17)(186:23)
 (189:17)(189:21)(192:2)(192:7)(192:9)
exhibits (2:2)(26:25)(176:19)
exist (94:11)(100:20)(147:7)(148:14)
existed (35:4)
existence (191:11)
existing (57:1)(119:1)(119:16)(125:13)
 (125:16)(127:5)(129:7)(130:9)(139:19)
 (140:15)(158:7)(164:21)(164:23)(165:2)
 (174:23)(175:14)(175:18)(175:21)(192:15)
expect (29:14)(49:13)(184:2)
expectations (162:4)
expected (114:5)(128:1)
expenses (37:7)(42:7)(44:1)(44:2)
 (46:20)(46:21)(49:22)(83:14)(84:4)(87:22)
 (87:24)(88:1)(88:2)(89:1)
experience (26:19)(50:25)(129:7)
expert (49:14)(94:16)(166:2)
explain (65:24)(72:12)(117:25)(121:25)
exposure (76:18)
extension (19:6)
extent (85:3)(148:5)(188:25)
external (97:5)(131:5)(169:4)
externally (80:10)
extra (171:19)
extremely (14:25)(52:18)(52:21)
eye (190:11)(190:13)(190:14)(194:17)
eyes (61:14)

F

face (44:20)(103:9)(140:24)(171:9)
facilitate (14:6)
facilities (13:4)(24:11)(80:18)
facility (9:9)(109:12)
facings (51:11)
fact (16:23)(29:18)(35:3)(41:24)(48:16)
 (55:19)(68:23)(69:14)(69:22)(110:11)
 (130:11)(176:15)(182:19)
fact-based (182:15)(182:20)(182:23)
 (182:25)(183:4)(183:25)(185:8)
factor (88:9)(123:13)(128:18)(194:20)
 (194:21)
factors (19:7)(51:8)(51:9)(93:19)
 (123:10)(123:16)(129:4)
factory (29:5)(48:7)
facts (68:19)(182:21)(183:7)(185:7)
fail (178:12)
faint (98:19)
fair (39:20)(51:2)(145:2)
fairly (151:18)
faith (75:20)
fall (16:8)(16:9)(17:13)(17:24)(23:2)

falls

(30:20)(89:13)(140:12)
falls (85:8)
familiar (15:10)(19:15)(57:10)(62:10)(142:19)
familiarity (155:18)
family (119:5)
far (8:13)(19:2)(19:7)(19:11)(50:8)(50:9)
fashion (37:17)(69:17)(70:3)(77:4)(138:20)(161:25)
fathom (94:12)
fax (192:5)(192:6)
fcst (96:1)
fda (171:20)
feasibility (190:16)(190:17)(190:18)(190:19)(190:25)(191:17)
feasible (190:20)
feature (15:13)(62:11)(66:19)(66:20)(86:4)(128:18)(167:13)(168:1)(168:2)(168:19)(175:14)(194:5)
featured (103:9)
features (61:15)(66:22)(66:24)(67:2)(71:13)(113:25)(114:19)(115:16)(115:20)(122:13)(122:15)(123:21)(127:6)(127:23)(128:13)(128:25)(129:6)(129:20)(140:10)(145:1)(145:25)(162:2)(167:9)(174:20)(174:23)(175:5)(175:8)(175:25)(176:3)(180:16)(182:4)(185:20)(193:20)(194:2)(196:8)
featuring (167:13)
february (2:13)(153:23)(155:11)
fee (44:6)
feel (54:23)(70:21)(147:12)
feeling (171:24)
fellow (128:11)
few (29:3)(51:13)
fewer (100:6)(100:9)
fifth (30:25)
figure (15:20)(34:5)(72:1)(78:17)(79:23)(87:10)
figures (60:19)(105:21)
file (136:16)
filter (162:19)(162:23)(162:25)(163:4)(177:5)
final (43:7)(43:12)(140:13)(140:14)(177:9)
finalizing (143:11)
finance (12:13)(12:24)(13:1)
financial (20:4)(21:7)(21:9)(21:11)(23:10)(24:15)(31:2)(32:16)(33:1)(36:16)(36:19)(68:6)(94:17)(104:17)(156:21)
financials (8:16)(7:4)(152:2)(152:5)
find (23:7)(48:12)(94:12)(131:11)
finding (172:10)(172:11)
findings (172:7)
fine (101:8)
finish (7:25)
finished (8:3)(8:17)
finite (111:19)
fins (115:17)
firm (124:3)
firms (10:6)(131:11)
first (4:21)(8:17)(8:18)(8:22)(14:20)(16:21)(17:3)(18:13)(18:15)(27:6)(30:22)

(31:4)(33:18)(50:10)(59:8)(60:23)(68:24)(78:3)(78:20)(78:21)(79:7)(79:14)(86:20)(87:4)(97:12)(98:20)(125:10)(142:25)(157:23)(162:15)(163:3)(168:10)(189:21)(192:10)
fiscal (2:4)(20:4)(20:5)(20:6)(20:11)(20:18)(20:20)(20:24)(30:8)(30:13)(30:15)(30:18)(33:10)(33:22)(39:17)(42:11)(42:12)(43:17)(43:21)(46:1)(47:6)(48:3)(59:11)(59:14)(60:25)(71:15)(72:7)(72:8)(72:10)(72:23)
fit (98:11)(114:1)(114:7)(127:5)(146:2)(165:20)
fits (127:25)(140:6)(140:7)
five (6:1)(6:5)(6:22)(30:21)(30:23)(78:6)(121:1)(166:17)
fixed (67:1)
flammability (83:6)
flashlights (184:5)(188:19)
flex (131:3)
flip (70:16)(71:8)(86:20)(192:21)
flow (18:25)
fluid (75:23)(76:9)(76:22)(97:23)(162:19)(163:4)(163:8)(163:10)(163:13)(165:1)(165:13)(165:25)(166:12)(176:4)(176:5)(177:1)(177:7)(177:10)
focus (70:19)(118:5)(174:1)(181:20)(194:22)(194:23)(194:24)(196:19)
focused (90:15)(90:20)(187:24)(188:9)(188:10)(188:11)(196:9)
focuses (195:21)
foil (2:8)(2:9)(17:8)(17:9)(58:23)(60:20)(63:19)(64:2)(64:3)(64:4)(64:5)(66:23)(66:24)(66:25)(73:3)(94:19)(94:20)(104:9)(115:9)(115:11)(115:17)(115:23)(123:1)(123:2)(123:12)(131:3)(165:5)(182:11)(191:14)(191:22)(191:23)(192:1)(193:24)
foils (63:23)(67:1)(104:3)(115:14)
folks (136:25)(137:2)(138:19)(142:19)(149:18)(154:4)(188:21)
folks' (188:5)
followed (127:22)(133:1)(161:18)
following (171:16)
follows (4:23)
follow-ups (151:25)
foolish (129:15)
force (9:21)(32:25)(44:21)(44:23)(45:2)(45:7)(50:23)(51:15)(100:17)(100:19)(101:1)(107:11)(117:5)(117:12)(117:14)(136:25)(149:21)(150:1)(150:4)(150:11)(150:24)(151:3)(153:11)(153:12)(153:18)(153:20)(153:22)(154:2)(154:3)(154:23)(156:9)(184:22)(184:23)(185:4)(185:9)
forecast (2:15)(50:11)(50:21)(50:22)(52:5)(52:23)(53:22)(54:2)(65:17)(67:14)(67:15)(95:25)(96:2)
forecasted (52:25)
forecasting (52:1)(67:21)
forecasts (2:8)(2:9)(50:12)(50:13)(50:19)(51:17)(51:18)(51:23)(52:9)(53:16)(65:18)(67:11)(67:13)(67:17)(70:1)(77:21)(101:15)

geared

foremost (14:20)
forever (81:23)
forget (185:25)
form (2:19)(2:20)(14:23)(37:13)(37:14)(68:14)(124:19)(124:20)(126:15)(130:19)(130:20)(130:22)(131:2)(138:19)(149:5)(175:4)(176:14)(179:18)
formal (15:7)(25:3)(25:4)(26:2)(26:3)(26:4)(75:1)(107:10)(129:10)(136:9)(136:13)(138:22)(146:23)
formally (75:4)(138:16)
format (36:14)(81:7)(157:6)(185:4)(185:18)
forth (137:18)(140:5)(173:11)(185:24)(194:1)
forty-four (192:8)
forward (130:21)(165:16)(165:17)(194:10)
found (34:22)(63:5)(69:6)(102:14)(159:16)
four (6:22)(21:3)(30:21)(30:22)(104:8)(162:8)(162:12)(162:13)
fourth (30:25)
fpo (152:13)(152:18)
frame (24:5)(38:9)(142:18)(162:3)
free (28:24)(41:17)(70:21)
freestanding (103:1)(159:7)(165:5)
freight (44:4)(46:23)(46:24)(46:25)(47:2)(47:3)(80:25)(82:4)(82:5)(82:6)(82:9)(83:25)(84:6)(91:22)
frequently (101:3)(101:5)
friday (34:14)(35:12)(35:18)(35:20)(60:13)(87:20)(88:12)(88:20)(89:6)(92:1)(92:15)(104:11)(111:25)
friday's (76:23)
fritz (187:22)
front (31:2)(36:3)(38:8)(38:12)(151:6)
fruition (66:14)
fsi (159:5)(159:6)(159:8)
full (22:8)(44:15)(138:12)
full-featured (67:7)
fully (103:14)(128:16)(168:25)(169:2)
function (10:11)(11:25)(82:10)(113:21)(180:20)
functional (100:14)
functionality (165:4)
functions (45:1)(107:1)(107:7)(188:3)
funds (46:12)(85:24)(90:11)
fur (98:9)(98:10)
further (8:4)(169:2)(197:10)
future (24:3)(24:4)(43:14)(178:23)(190:2)
fuzz-away (188:24)

G

gaap (32:17)(33:3)(41:14)(84:2)
gain (193:9)(194:1)
gains (195:7)
gathered (56:25)
gathering (154:1)
gave (41:18)(57:4)(88:20)(136:21)(143:18)(179:24)
gear (133:11)
geared (36:1)(67:21)(137:16)(156:8)

general

i'm

(191:19)
general (16:14)(23:23)(24:2)(30:1)
 (90:12)(91:23)(105:15)(111:11)(127:19)
 (132:12)(152:15)(174:7)(192:9)(194:12)
generally (19:11)(21:20)(44:13)(45:15)
 (50:22)(52:15)(61:17)(65:18)(66:4)(67:18)
 (78:24)(78:25)(79:3)(98:13)(101:15)
 (103:3)(103:7)(103:9)(105:5)(105:8)
 (105:9)(106:17)(110:23)(113:10)(115:11)
 (115:12)(127:11)(151:15)(151:23)(153:1)
 (153:2)(154:21)(196:6)(197:2)
generate (34:6)(73:11)(77:13)(87:13)
 (101:3)(101:9)(101:11)(159:17)(160:6)
generated (24:12)(34:9)(73:6)(79:12)
 (79:15)
germany (13:11)
gets (36:5)(120:15)(182:25)
gifted (31:25)
given (26:19)(50:15)(50:17)(55:12)
 (81:21)(82:7)(86:15)(106:7)(130:4)
 (131:12)(134:3)(143:20)(154:19)(168:7)
 (174:8)(176:19)(176:20)(184:14)(185:9)
 (185:14)(190:3)(190:5)(195:9)
gives (32:5)(109:14)
giving (160:3)
gmbh (1:4)(4:3)
goal (14:21)
goals (169:7)(169:11)
gone (119:3)(171:12)(184:25)
good (5:4)(5:5)(41:12)(52:15)(65:23)
 (66:1)(67:4)(71:10)(104:20)(107:7)
 (116:11)(118:10)(118:11)(118:13)
 (118:15)(118:16)(122:14)(143:20)(144:2)
 (184:14)(184:18)(185:7)
goods (19:19)(19:24)(29:8)(29:9)
 (31:23)(37:3)(37:6)(40:20)(40:21)(41:7)
 (41:22)(44:9)(46:17)(81:1)(82:7)(82:15)
 (83:13)(87:10)(87:18)(132:16)
gosh (121:3)
gotten (24:4)
government (171:13)
graduate (8:8)
graduation (8:6)
granted (24:9)
granularity (86:6)(91:24)
gray (4:13)
great (184:19)(187:17)
greg (87:8)
groomer (188:22)
grooming (16:18)(68:11)(97:20)(98:12)
gross (31:8)(31:9)(31:14)(31:18)(36:4)
 (37:6)(40:25)(41:3)(43:25)(46:18)(71:18)
 (72:1)(75:15)(75:16)(88:17)(88:19)(88:23)
 (88:25)
grounds (92:22)(179:15)
group (16:13)(29:20)(51:20)(54:3)
 (65:25)(94:21)(94:23)(99:19)(101:16)
 (149:18)(153:19)(181:20)
grouping (89:18)(99:6)(99:7)(99:25)
 (101:2)
groups (15:19)(44:19)(106:7)(125:1)
 (174:1)
grow (118:21)
growth (118:4)(118:6)(118:13)

guess (14:18)(15:16)(16:3)(25:4)(37:4)
 (42:17)(50:13)(61:11)(71:1)(71:8)(81:11)
 (83:22)(86:18)(96:3)(96:15)(99:14)
 (100:16)(112:10)(118:24)(123:9)(132:22)
 (133:20)(134:1)(146:13)(149:1)(150:5)
 (182:25)
guessing (20:12)
guidelines (107:20)

H

hair (184:5)
hairs (115:17)
half (11:19)(15:8)(154:16)(189:24)
halfway (8:14)
hand (155:3)
handle (15:1)
handled (21:20)(21:23)
handout (154:19)
handouts (185:9)
happen (76:5)(82:23)(98:22)(106:24)
happened (53:6)(63:3)(160:25)(161:2)
 (161:4)
happening (137:17)(184:3)
happens (107:16)(153:13)
happy (43:1)(54:17)(55:1)
hard (20:17)(30:19)(154:22)(155:4)
 (186:7)
hasn't (77:20)
having your (44:18)
head (57:20)(77:2)(77:10)(111:14)
 (112:21)(123:8)(128:16)(165:22)
header (192:5)(192:6)
heading (118:1)(191:20)
headings (46:3)
headquarters (9:17)(12:8)
heads (165:1)(187:23)
hear (119:1)(119:2)(119:3)(145:12)
 (149:22)
heard (184:1)
hearing (9:12)(68:12)
heavily (48:17)
heavy (77:20)(196:12)
heavy-duty (68:11)
heck (100:18)(139:4)
help (14:4)(14:6)(20:3)(32:22)(59:12)
 (99:20)(135:15)(141:21)(184:6)(184:9)
helpful (35:15)(99:21)
her (101:22)(185:23)(188:14)
hereby (198:4)
he's (50:8)(127:18)
hey (102:19)(149:19)
hierarchy (39:4)
high (7:23)(77:15)(112:5)(144:10)
 (168:16)(168:21)(168:22)(168:24)(169:5)
 (171:25)
high-end (172:17)(182:11)
higher (53:15)(57:24)(61:20)(61:22)
 (67:8)(110:3)(110:6)(110:14)(110:15)
 (115:11)(115:12)(123:9)(123:11)(123:14)
 (130:3)(130:8)(156:14)
highest (111:9)(111:11)(169:3)
highlight (155:24)
highlighted (183:5)(183:8)
historically (77:19)(146:1)

history (7:22)(18:14)(176:7)
hit (96:5)(122:16)(132:18)(140:11)
hoc (74:6)(74:25)(101:9)
hold (33:25)(108:3)(141:1)
holds (27:15)(149:1)
holes (164:25)(165:12)(165:17)
 (165:22)(165:25)(166:5)(166:12)
holiday (19:9)(19:10)(19:14)(120:11)
 (120:19)(159:17)(159:18)(160:12)
home (31:25)(98:4)(154:24)(155:6)
honestly (111:21)(157:15)
honor (109:25)
hours (6:22)
house (27:14)(124:12)
household (171:8)
hovis (170:16)
however (27:16)(49:1)(60:15)(74:15)
 (76:6)(107:25)(117:9)
hts (82:10)
huge (77:19)(103:16)
human (63:8)
hundred (100:4)(100:6)(126:18)
hurry (100:18)
hypothetically (193:21)

I

icl (46:3)
idea (59:24)(74:3)(98:25)(114:8)
 (114:10)(129:16)(132:17)(132:19)
 (132:21)(132:23)(133:21)(167:23)
 (167:24)(189:11)(189:12)(189:16)
ideas (189:6)(189:7)(189:9)
identification (5:1)(26:25)(49:23)
 (54:8)(64:7)(64:22)(70:15)(73:17)(78:5)
 (92:24)(95:3)(95:17)(97:10)(104:23)
 (116:17)(130:15)(141:7)(153:3)(156:22)
 (169:22)(172:4)(180:7)(189:17)(192:2)
identified (19:17)(37:8)(40:12)(175:3)
 (182:3)
identifier (102:17)
identify (17:15)(17:17)(17:19)(69:3)
 (99:20)(102:1)(112:4)(151:17)(175:25)
ilc (31:4)(31:6)(32:10)(32:11)(32:12)
 (40:17)(72:3)
i'll (17:19)(69:15)(152:15)(152:17)
 (178:12)(192:4)(196:8)
illegal (126:14)
illinois (4:16)
i'm (5:15)(8:10)(11:1)(13:6)(16:5)
 (16:15)(16:19)(19:15)(20:12)(20:13)(23:1)
 (23:6)(25:8)(25:17)(26:2)(33:2)(33:4)
 (34:21)(34:24)(38:20)(40:3)(43:1)(46:23)
 (49:6)(53:20)(53:25)(54:1)(54:17)(54:20)
 (54:22)(55:1)(57:10)(57:16)(57:18)(58:9)
 (58:20)(59:5)(62:4)(62:10)(62:21)(63:11)
 (64:5)(68:13)(69:22)(70:9)(70:12)(71:15)
 (72:25)(74:1)(74:10)(74:25)(75:2)(78:25)
 (80:11)(81:11)(82:19)(83:22)(84:21)
 (86:17)(89:24)(92:20)(92:23)(96:4)(98:3)
 (99:15)(99:16)(103:19)(104:14)(106:13)
 (107:10)(110:8)(111:22)(121:3)(122:23)
 (127:19)(128:9)(131:8)(131:15)(132:4)
 (133:16)(134:18)(134:21)(137:9)(140:19)
 (141:3)(142:19)(142:24)(145:15)(146:14)

imagine

(146:15)(148:24)(148:25)(150:13)
 (152:16)(155:22)(159:25)(160:24)
 (162:12)(162:13)(163:1)(163:8)(165:18)
 (166:1)(166:9)(167:17)(167:20)(168:15)
 (169:13)(172:2)(175:24)(179:6)(179:19)
 (179:23)(180:17)(182:9)(186:4)(187:19)
 (192:9)(197:4)
 imagine (81:17)(167:1)
 immaterial (93:23)
 immediately (152:2)
 impact (93:22)(148:18)(148:19)
 (148:21)(152:2)(193:25)
 impacted (165:24)
 implementation (11:17)
 implicitly (178:7)
 important (171:21)(171:23)(174:23)
 (193:23)(194:4)(195:1)
 impossible (40:13)(82:8)
 improve (52:14)(175:18)(175:19)
 improved (183:12)(183:13)
 improvement (52:13)
 improvements (183:16)(183:18)
 inappropriate (22:8)(84:2)
 include (34:7)(41:13)(44:3)(45:22)
 (47:2)(48:11)(48:12)(60:15)(80:24)(90:7)
 (97:23)(137:24)(165:17)
 included (22:5)(23:7)(23:9)(30:5)
 (35:25)(40:24)(46:3)(48:13)(60:12)(62:1)
 (80:13)(83:9)(83:16)(84:8)(87:19)(87:21)
 (88:8)(90:3)(90:5)(92:2)(93:10)(93:11)
 (93:12)(93:13)(93:15)(101:16)(115:16)
 (147:21)(148:11)(155:12)(155:21)
 (162:10)(176:1)(191:5)(191:24)(191:25)
 includes (36:10)(48:20)(85:2)(89:6)
 (104:16)(153:18)(154:1)(162:9)
 including (13:18)(68:7)(108:11)
 inconspicuous (97:9)
 incorporate (102:2)(137:19)(139:8)
 (162:8)(175:9)
 incorrectly (113:14)
 increase (195:6)
 increased (158:11)
 independent (14:2)(124:3)(128:16)
 (131:10)
 indicate (18:14)(28:9)(59:18)(61:4)
 (61:5)(176:14)
 indicated (35:2)(45:11)(101:15)
 (166:10)(172:7)(186:25)
 indicates (30:7)(48:19)(50:10)(55:18)
 (108:12)(170:1)
 indicating (54:11)(65:5)(101:12)
 (135:12)(147:3)
 indication (19:22)(51:2)(51:6)(73:23)
 (95:10)(130:22)(144:15)
 indirectly (56:14)(56:18)
 individual (27:18)(35:18)(82:9)(85:14)
 (86:17)(91:1)(94:14)(109:3)(132:20)
 (132:23)(147:12)(155:23)(161:11)
 individually (45:16)(82:8)(163:2)
 (163:3)(163:6)
 individuals (26:7)(71:22)(84:12)
 (101:19)(101:21)(132:13)(135:18)
 (135:20)(138:7)(142:10)(142:14)
 industry (158:9)(158:14)(158:17)

kevin

(182:20)(195:2)
 infirm (101:7)
 informal (129:12)(129:14)(129:17)
 information (23:2)(23:18)(25:14)
 (25:15)(27:6)(27:8)(27:16)(27:20)(36:2)
 (36:6)(36:8)(36:22)(36:23)(36:25)(37:1)
 (38:11)(38:12)(42:3)(42:5)(43:13)(48:10)
 (56:25)(66:25)(69:1)(69:8)(69:13)(69:16)
 (69:20)(70:4)(71:23)(74:3)(74:7)(75:14)
 (77:5)(85:17)(96:24)(101:9)(104:13)
 (104:18)(108:16)(111:14)(111:16)
 (117:15)(124:1)(124:6)(124:8)(124:9)
 (138:14)(149:20)(155:17)(155:21)(156:4)
 (156:9)(156:13)(157:7)(174:12)(184:23)
 (185:18)(185:19)(186:17)(186:18)(186:22)
 informed (149:22)(150:1)(150:11)
 informing (150:3)(150:14)
 infringement (175:12)(180:4)
 initial (35:24)(36:1)(113:14)(189:6)
 (189:7)(189:9)(189:11)
 initially (60:7)(65:15)
 initiate (58:13)
 initiative (122:8)(146:16)(149:7)
 (151:17)(159:20)
 initiatives (118:5)(122:4)(147:6)
 injunction (149:2)
 input (50:24)(51:16)(108:19)(177:16)
 inserts (159:7)
 inside (6:14)(28:24)(29:1)(131:5)
 (131:14)(168:11)(179:7)
 insight (193:9)
 instance (168:23)
 instant (160:4)
 instead (160:3)
 instruct (84:21)(92:21)(148:7)(177:24)
 (178:16)
 instruction (178:10)
 integral (131:4)(163:16)
 integrally (164:2)(164:10)
 integration (13:24)(14:16)
 intent (156:1)(181:9)(181:11)(195:19)
 intention (56:6)(193:25)
 interchange (106:14)
 interchangeably (137:10)
 interest (2:19)(2:20)(168:21)(194:1)
 (198:12)
 interested (71:15)(75:15)(127:19)
 (170:2)(170:25)(171:3)(191:2)
 interface (44:23)
 internal (24:18)(39:1)(96:25)(97:3)
 (97:10)
 internally (25:23)(25:25)(80:5)
 international (4:13)
 interrogatories (198:10)
 interrupted (14:22)
 introduce (56:10)(61:8)(64:1)(119:20)
 (158:3)(158:7)
 introduced (66:5)(121:14)(122:12)
 (122:21)(123:18)(123:20)(164:15)(165:6)
 (191:14)
 introducing (158:12)
 introduction (55:14)(113:8)(119:25)
 (122:18)(123:12)(127:1)(134:10)(141:17)
 (179:8)(181:15)(196:23)

introductions (120:4)
 inventory (19:21)(25:20)(28:6)(50:20)
 (51:19)(51:20)(51:21)(51:22)(52:3)(52:10)
 (54:3)(101:16)
 invite (147:10)
 invoice (31:6)(31:17)(31:18)(31:19)
 (97:4)(105:11)(109:10)(110:3)(110:14)
 (111:1)(111:25)(114:6)
 invoiced (107:6)(107:24)
 involved (15:22)(23:5)(54:1)(56:10)
 (56:14)(58:10)(58:11)(78:25)(79:2)
 (100:24)(128:3)(128:12)(135:18)(135:19)
 (138:7)(142:11)(142:15)(142:17)(143:4)
 (143:8)(143:11)(154:10)(154:12)(154:14)
 (161:24)(164:3)(166:21)(166:23)(167:1)
 (167:3)(177:9)(177:23)(178:4)(178:5)
 (178:7)(178:15)(180:3)(180:5)(180:17)
 (180:19)
 involvement (67:25)
 issue (17:15)(37:9)(80:15)(80:17)
 (152:3)
 issues (32:25)(151:1)(151:2)(151:9)
 (151:13)(151:23)(152:7)(152:11)
 item (19:19)(41:17)(107:18)(107:21)
 (107:25)(108:1)(113:1)(131:12)(151:9)
 (172:8)
 items (36:14)(36:17)(36:21)(37:4)
 (37:14)(41:10)(44:3)(63:23)(91:15)(98:4)
 (103:12)(105:1)(126:25)
 its (81:23)(107:23)(118:11)(158:22)
 (160:22)(169:11)(169:14)(169:18)
 (175:10)(195:23)
 itself (97:7)(97:8)(115:18)(136:8)
 (163:11)(164:25)
 i've (129:13)
 izumi (82:17)(82:20)

J

january (20:23)(122:1)(122:9)(122:24)
 jay (128:11)(142:17)
 jeff (170:16)(170:18)
 jenny (135:16)
 jetted (165:1)
 jim (6:16)(134:23)(134:24)(135:3)
 (135:8)(135:17)(136:22)(138:20)(142:16)
 (157:20)(162:5)(170:20)(181:4)(186:16)
 job (8:17)(8:18)(9:16)(13:13)(99:10)
 (188:1)
 john (187:22)
 july (21:2)(78:23)(79:6)(122:1)(122:9)
 (122:24)(123:1)
 jump (100:18)(122:11)
 june (2:21)(20:25)

K

kasdorff (54:7)(101:22)
 katie (187:21)(188:16)
 katz (142:22)(142:23)(142:24)(143:7)
 (170:13)
 keeping (194:12)(194:14)
 kent (150:7)(150:8)(150:23)
 kernen (1:23)(4:7)(198:3)
 kevin (4:15)(6:18)(6:19)(6:23)(7:13)
 (33:24)(35:9)